The Plainfield Town Hall 8 Community Avenue Plainfield, CT 06374



R01-13-A-027

Telephone (860) 230-3000 Fax (860) 230-3033

December 3, 2012

Environmental Management Support Group, Inc. Attn: Mr. Don West 8601 Georgia Avenue, Suite 500 Silver Spring, Maryland, 20910 301-589-5318

RE: Former InterRoyal Corporation Property
Brownfields Site-Specific Assessment Grant Application

Dear Mr. West:

It is my pleasure to submit to you and to the Environmental Protection Agency the Town of Plainfield, Connecticut's (the Town) application for a \$200,000 Site-Specific Brownfields Grant for Hazardous Substance Assessment of the Former InterRoyal Corporation Property (the Site), located at 20 Reservoir Road, Plainfield, County of Windham, Connecticut. The Site is approximately 16.6 +/- acres in size and contains two structures, a 70,146 square foot former factory building and a 4,500 square foot former research building.

The Town does not own the Site. However, we have legal access to conduct environmental investigations of the property under the provisions of Connecticut General Statute (CGS) Section 22a-133dd. This section allows municipalities to conduct environmental investigations on properties that have no legally viable owner, on properties which are encumbered by a lien for taxes due the community, or on properties for which an investigation is necessary to determine if the property represents a risk to the safety, health, or welfare of the public or a risk to the environment.

The Site has been the subject of several environmental response actions conducted by EPA, including removal of abandoned containerized waste, installation of fencing, removal of PCB contaminated soil, and cleanup of asbestos and lead contaminated debris after a 653,000 square foot section of the Site was destroyed in a massive fire.

The remaining buildings contain asbestos, lead-based paint, and mercury and PCB containing electrical equipment. Soils on the Site contain metals, including lead, asbestos, volatile and semi volatile organic compounds, and PCBs. Groundwater is contaminated with chromium, nickel, SVOCs, and chlorinated VOCs.

The Site represents a major source of blight and is a significant threat to public health. Restoration of the Site will abate this threat, increase tax revenue, and create employment opportunities in both our rural Town and the surrounding region. The Town has dedicated considerable effort, over the last 15 years, to investigation of the building-associated hazards and soil and groundwater contamination on the Site. The Town will use the assessment grant to fill data gaps in previous investigations so that accurate remedial action plans, cost estimates, bid specifications, and contract documents can be prepared to abate and remediate the building-associated hazards and soil and groundwater contamination.

Town of Plainfield **Applicant Identification:**

> Plainfield Town Hall 8 Community Avenue

Plainfield, Connecticut 06374

Applicant DUNS Number: 081 294 372

Funding Request: Grant Type: Assessment

Amount: \$200,000

Contamination: Hazardous Materials comingled with petroleum

Location: Plainfield, Windham County, Connecticut

Property Name: Former InterRoyal Mill Property

20 Reservoir Street, Plainfield, Connecticut 06374

Project Director: Shelley Hopkins

Economic Development Coordinator

Plainfield Town Hall 8 Community Avenue

Plainfield, Connecticut 06374

(860) 230-3003 (860) 230-3033 (fax) shopkins@plainfieldct.org

Chief Executive: Mr. Paul Sweet, First Selectman

> Plainfield Town Hall 8 Community Avenue

Plainfield, Connecticut 06374

(860) 230-3000 (860) 230-3033 (fax)

Date Submitted: November 28, 2012 June 2013 to June 2016

Project Period:

Population: 15,472 (CERC)

Sincerely,

TOWN OF PLAINFIELD, CONNECTICUT

Shelley Hopkins, Project Director

Enclosure

CC: Diane Kelley, Regional Brownfields Coordinator, US EPA Region 1 (w/enc.)

Paul Sweet, First Selectman

PROPOSAL TO US ENVIRONMENTAL PROTECTION AGENCY FOR FY 2013 BROWNFIELDS HAZARDOUS MATERIAL ASSESSMENT GRANT

FORMER INTERROYAL CORPORATION PROPERTY PLAINFIELD, CONNECTICUT

PART I THRESHOLD CRITERIA

1. APPLICANT ELIGIBILITY

a. Eligible Entity: The Town of Plainfield, Connecticut (Town) is an incorporated municipal government in the State of Connecticut. The Town is leading an investigation of the former InterRoyal Corporation (InterRoyal) Property (Site), a 16.6 ± acre parcel of industrially zoned land located at 20 Reservoir Street.

Site Ownership: The Town does not own the Site. However, under Connecticut General Statues (C.G.S.) Section 22a-133dd the Town has legal access to the Site to conduct Brownfields investigations if either the owner of the Site cannot be located, the property is encumbered by a lien for taxes due to the municipality, or any official of the municipality reasonably finds an investigation is necessary to determine if such property presents a risk to the safety, health or welfare of the public or a risk to the environment. The Town meets the criteria for entry onto site to conduct a Brownfields assessment since:

- InterRoyal Corporation, a defunct corporation that no longer exists as a legal entity, is the sole owner of the Site (see Attachment A);
- InterRoyal is in arrears to the Town by an amount of approximately \$767,800 for combined property taxes and sewer assessments;
- The Town recognizes that the Site represents a risk to the safety, health and welfare
 of the public and the environment. However, the extent of this risk has not been fully
 characterized.

The Town has, under authorization of this Section, conducted previous environmental investigations of the Site including an EPA Brownfields Targeted Site Assessment (TBA). The deed to the Site, evidence supporting the status of InterRoyal relative to Section 22a-133dd, and the Board of Selectmen's resolution recognizing the Site as a risk to safety, health and welfare of the public and the environment are submitted as Attachment A.

2. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY

The Connecticut Department of Energy and Environmental Protection (CTDEEP) acknowledged that the Town of Plainfield plans to conduct assessment activities at the Site and intends to apply for federal grant funds. The State's acknowledgment letter is submitted as Attachment B.

3. SITE ELIGIBILITY AND PROPERTY OWNERSHIP ELIGIBILITY

a. Basic Site Information:

- i. <u>Site name:</u> Former InterRoyal Corporation Property
- ii. Site address: 20 Reservoir Street, Plainfield, Connecticut 06374
- iii. Site owner: InterRoyal Corporation

b. Status and History of Contamination at the Site:

- i. <u>Site Description:</u> Previous Phase I, Phase II and TBA investigations of the Site determined that it is 16.60 ± acres in size and currently contains two buildings: a one story 70,146 square foot (SF) factory building and a 4,500 SF research/office building, both constructed in 1906. The Site also contains the foundations of a former three-story 653,000 SF mill building that was destroyed by fire in 2005, and three interconnected surface water reservoirs that are fed by Horse Brook and drain to Mill Brook.
- ii. <u>Contamination:</u> The existing structures contain ACM, surfaces coated with lead-based paint, electrical equipment containing PCBs or di(2-ethylhexyl) phthalate (DEHP), and mercury-containing electrical and lighting equipment. The buildings also contain biohazards, including mold infestation and guano.
 - Site investigations confirm that soil and groundwater are contaminated with hazardous material and hazardous material commingled with petroleum. Soil contaminants include volatile organic compounds (VOCs) polycyclic aromatic hydrocarbons (PAHs), asbestos, metals (primarily chromium, lead, nickel, and zinc), petroleum (TPH), and PCBs. Groundwater contaminants include VOCs, TPH, metals (nickel and chromium), and PAHs. The most recent site investigation was the TBA conducted on behalf of the Town by EPA in 2000-2002. The TBA recommended additional investigation of soil, groundwater, and building materials to obtain the data required to prepare a remedial action plan for the Site.
- ii. <u>Site operational history:</u> The Site is a former manufacturing facility that was constructed in 1906 and operated until 1986. From 1906 until the 1940s the Site manufactured textiles. After that time, manufacturing use was converted to production of textiles and furniture. In the mid-1950s InterRoyal converted the site to the manufacture of institutional furniture, which involved metal working, metal plating, degreasing, and painting. Manufacturing operations ceased in 1986 due to bankruptcy of InterRoyal.

Between 1986 and 1995 InterRoyal leased portions of the Site to a plastics recycler, a woodworking company, and a plumbing warehouse. The building deteriorated significantly during this time period.

EPA conducted a preliminary assessment and site investigation of the Property in 1991, documenting that drums and bulk chemicals remained in the building. In 1995, once the property was fully abandoned, EPA removed large volumes of hazardous contaminants from the Site, including over 680 drums and other containers containing acids/bases, cyanides, flammable liquids, and other hazardous substances; 48 vats containing over 10,000 gallons of plating solutions; and five large transformers containing 3,866 gallons of PCB-contaminated oil. The cost of these actions alone was approximately \$1.3 million.

In 2000-2002 EPA's Brownfields Program conducted a TBA to characterize asbestos, lead, and other hazardous substances at the Property. In 2003, EPA conducted another removal action which primarily addressed site access issues,

PCBs, and asbestos. This action involved posting warning signs, putting up site perimeter fencing, and excavating and removing PCB-contaminated surface soils.

The northern (3-story) portion of the mill building burned in a massive fire that took place on April 26, 2005 and lasted for two days. The fire spread asbestos and lead contaminated debris and ash over a large area of the Town, including several low to lower-middle income neighborhoods in the villages of Plainfield and Wauregan. After the fire, EPA conducted an additional removal action from 2005 to 2006 to clean up lead and asbestos-contaminated debris from the Site and the downwind debris field.

The 70,100 SF one-story section of the mill building and 4,500 SF research building remain on the site. These remaining structures are in an advanced stage of deterioration, and remain a target for arsonists.

iii. <u>Environmental concerns:</u> Contaminants identified on or within the Site's buildings, soils, and groundwater are a major impediment to Site redevelopment and represent a risk of exposure to human and environmental receptors. The southern portion of the Site is located within the Zone II of the municipal well field that supplies the Town of Plainfield public water system. Contaminants in the remaining structure require abatement prior to demolition, whereas soil and groundwater contaminants require remediation to prevent exposure to existing and future human and environmental receptors.

At least seven Areas of Concern (AOCs) exist on the Site including underground and above ground storage tanks, former locations of PCB-containing transformers, a paint sludge disposal area, former hazardous waste storage area, vapor degreaser area, metal plating area, paint line drag out trench, and the Bonderizer (a metal washing machine) sump. The roof field and thermal insulation of the remaining buildings contain asbestos.

Assessment and quantification of structure-associated and soil and groundwater contamination is not complete. These data gaps are hindering the evaluation of human and environmental risk assessments, and the preparation of defensible remedial action plans and cleanup and abatement specifications, which are needed to remove environmental hazards and prepare the Site for redevelopment.

iv. How the Site Became Contaminated: All contamination identified on the Site originated from activities that took place prior to its abandonment by InterRoyal and from the 2005 fire. Contamination identified in the Site's structures is due to the use of construction materials that contained asbestos, lead, or PCBs, and the installation and use of electrical equipment containing mercury, PCBs, or DEHP. Soil and groundwater contamination is due to InterRoyal's operational and disposal practices including use of coal, use of No. 2 oil and No. 6 oil as boiler fuel, disposal of lead paint sludge, use of chlorinated VOCs as a degreasing agent, painting and metal plating operations, as well as shedding of interior and exterior lead-based paint and friable and non-friable asbestos due to deterioration of buildings and the 2005 fire. Groundwater is contaminated by chlorinated VOCs, chromium, and nickel. The extent of soil and groundwater contamination may have been exacerbated by the 2005 fire.

- c. Affirmation that the Site is not Ineligible for Funding: The Site is not ineligible for funding as it is not proposed for listing on the National Priorities List, is not subject to unilateral administrative orders, court orders, administrative orders or judicial consent decrees entered into by parties under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or the Toxic Substances Control Act, and is not subject to the jurisdiction, custody, or control of the United States government.
- d. Property-specific Determination: A property-specific determination is not required.

e. CERCLA Section 107 Liability:

The Town of Plainfield affirms that it is not liable for contamination at the Site under CERCLA Section 107 as the Town does not own the property. The Town is protected from state liability under CGS Section 22a-133dd (see Appendix A) if it enters the Site to conduct environmental investigations. See Section g for details on this protection.

f. Environmental Enforcement Actions:

The Town asserts that the Site is not the subject of a pending environmental enforcement action.

g. Information on Liability and Defenses/Protections Where Applicant Owns the Site:

The Town does not own the Site; therefore it does not have liability under CERCLA. Connecticut General Statutes Section 22a-133dd provides the Town with liability protection if it conducts environmental investigations of the Site. The Town has no familial, contractual, corporate or financial relationships or affiliation with the prior Site owner other than those associated with the liens for unpaid taxes and sewer use fees.

PART II RANKING CRITERIA FOR CLEANUP GRANTS

1. COMMUNITY NEED

a. Health, Welfare, and the Environment:

<u>Effect of Brownfields on the Community:</u> The Site is the only abandoned Brownfields property in the Town of Plainfield. The Site has a significant impact on the community as it is a large, blighted property located in the heart of the Village of Plainfield. The dilapidated structures and contaminated soil and groundwater represent multiple exposure risks to human and environmental receptors. They are also a significant impediment to redevelopment of not only the Site, but of other abandoned and underused properties in the Village.

The abandoned structures remain a target for arsonists. Another fire on the Site is certain to release to the atmosphere friable asbestos in pipe and boiler insulation, and lead, PCBs, and mercury in building materials/electrical equipment, thereby posing a direct contact threat to local residents. Aromatic and chlorinated volatile organic compounds in the groundwater pose a threat to Horse and Mill Brooks and the nearby municipal well field.

As the Site is located in the center of the Village, potential receptors include the entire nearby community, which consists of several neighborhoods of former mill housing occupied by low and lower-middle income households. The estimated population within a one-quarter mile radius of the Site is 589 people, and within a one-mile radius, 2,973

people (EPA Action Memorandum for the InterRoyal Site, August 23, 2005). This population includes children (including an elementary school), low income populations, and elderly (the Villa Maria Nursing and Rehabilitation Facility is located adjacent to the Site).

The value of homes in the vicinity of the mill is depressed relative to current market value due to their close proximity to what is perceived to be a significant potential threat to the health and safety of residents. This has placed an additional economic burden on property owners seeking to refinance or sell their property.

Although the Town of Plainfield is in a rural area, there is minimal green space within the village of Plainfield. The portion of Horse Brook that flows through the InterRoyal property is channelized and flows through several concrete reservoirs that provide no value to wildlife.

Human Health Threats: The Site contains decaying, contaminated structures that represent a significant risk to human health through possible exposure to contaminants from multiple sources via several exposure pathways. Building contaminants include friable and non-friable ACM, peeling lead paint, suspected PCB caulk, and hazardous material-containing building fixtures, including transformers, switches, and lighting fixtures. Deterioration of thermal insulation has resulted in scattering of friable ACM insulation throughout the buildings. The expansive roof field of the 70,146 SF one-story mill building contains ACM. The buildings are infested with mold and contain significant deposits of guano. These conditions pose a direct and immediate health threat to residents if these materials are released during a building collapse or fire.

On April 26, 2005 an arsonist caused a massive fire that destroyed the northern 3-story section of the mill building. This fire burned out of control for two days despite the combined efforts of 20 fire companies from surrounding municipalities. Residents of the adjacent low and lower-middle income neighborhoods were evacuated, and the Plainfield elementary school was temporarily closed. Asbestos and lead-containing debris from the fire covered a five square mile area and included low and lower-middle income neighborhoods in the villages of Plainfield, Central Village and Wauregan. EPA expended approximately \$2,000,000 to clean up asbestos and lead-contaminated debris on the Site and in the downwind debris field, which included the three Villages. Attachment C3 contains a letter from the Plainfield Fire Department describing past fire incidents on the Site and the potential fire hazard the remaining buildings represent.

The Site is within the Zone II of the well field that supplies Plainfield's public water supply system. Although the chlorinated VOCs identified in the Site's groundwater have not yet been detected in the water supply wells, the permeable alluvial deposits that underlie the Site are contiguous with the deposits in which the well field is developed. A large dug well located inside the main structure provides a direct pathway for surface contamination migration to groundwater; therefore the Site represents a potential source of contamination to the Town's water supply.

<u>Environmental Threats:</u> Sensitive environmental receptors within or adjacent to the Site include Horse Brook, which flows through the Site, Mill Brook into which Horse Brook

discharges, and associated fisheries and wildlife. Sediments in Mill Brook are known to have been impacted by petroleum and metals discharged from the Site.

<u>Impacts to Welfare:</u> The Site is located in the heart of the Village of Plainfield and abuts a public recreation area, the Town's municipal offices, and several low and lower-middle income residential areas. These residential areas were directly impacted by the 2005 fire, which forced the evacuation of residents in surrounding neighborhoods and deposited ACM debris on neighborhoods up to 5 miles downwind of the Site. The recreation area and the surrounding neighborhoods are likely to be adversely impacted again if another fire breaks out in the Site's remaining buildings.

The deteriorated condition of the Site's building and presence of exposed friable asbestos and lead-contaminated soil currently represent a risk to public health and safety.

b. Financial Need:

Economic impact of Brownfields: For almost 80 years, the Site was a primary employer in Plainfield. Several hundred high wage employment opportunities were lost when the InterRoyal facility closed in 1986. This closure had a drastic impact on the local economy. The area suffered additional significant job losses due to the general decline of manufacturing in Windham County, which continues to lose high paying manufacturing jobs. These jobs have been replaced by lower wage service employment. However, the recent economic down turn has impacted even these jobs, with the nearby Foxwoods and Mohegan Sun casinos laying off over 1,300 employees since 2008. In August 2012 alone, the casinos cut 300 additional jobs.¹

The demographic profile of Plainfield, summarized below, is based on data obtained from the Connecticut Economic Resource Center, Inc. (CERC) and the U.S. Census Bureau.

Demographic Statistics	Town ²	State ³	National ³
Total Population (2011)	15,472	3,574,097	308,745,538
Population Density (2011)	366	728	87
White (%)	93.6	77.8	71.2
Hispanic ¹ (%)	4.5	12.4	16.0
Asian ¹ (%)	1.1	3.53	4.51
African American (%)	1.2	9.12	12.0
Population under Age 18 (%)	23.3	25	26
Population over Age 65(%)	13.5	13.4	11.9
Median Household Income	\$61,488	\$72,781	\$55,970
Percentage of Population Below Poverty Line (2009) ¹	5.61	11.9	14.3
Rate of Unemployment (%)	10.31	7.6	7.9
Travel Time to Work (minutes)	27 ²	24.6	25.2

Citations: 1. New London Day, September 27, 2012 2. CERC. 3. 2010 Census

Without the economic anchor once provided by InterRoyal, Plainfield Village has become a revolving door for small businesses, few of which survive for any length of time in the blighted downtown area. According to the Connecticut Economic Resource Center, Inc. (CERC), small services, trade, and construction companies account for

70.2% of local employment. These small businesses have been severely impacted by the economic downturn. Manufacturing and industry employs less than 20% of workers. The majority of the Town's working residents must travel more than 30 minutes beyond the town's borders to find employment.

The close proximity of the Site to the Town's municipal offices has adversely impacted new business investment. The Site's blighted, deteriorated buildings literally form a backdrop to the municipal offices, and project a strong negative image of the Town as a place where new businesses would want to invest.

In the 1990s the US Department of Agriculture (USDA) awarded the Town a grant to construct an underground flood bypass conduit through the InterRoyal property to eliminate the flood hazard in the Village of Plainfield. Because the Town was unable to fund the disposal of contaminated Site soils along the conduit corridor, the USDA withdrew the grant and flood hazard was left unabated. As a result, insurance costs remain prohibitive for Village businesses, creating another barrier to revitalization of the neighborhood. The Village Library was recently forced to close in part due to the excessive cost that flood insurance placed on their operating budget.

ii. <u>Limited ability to fund assessment:</u> Poor economic conditions have reduced Plainfield's tax base to a level where revenue growth is insufficient to meet inflation alone. This has resulted in a multi-year series of budget shortfalls despite a steady cut in core Town services and the freezing of wages. In this climate of shrinking revenue and increasing costs, the Town is unable to self-fund the assessment and documentation required at the Site to prepare it for remediation and redevelopment.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description:

<u>Proposed project:</u> The Town's Plan of Conservation and Development (POCD) identifies the InterRoyal property as a Brownfield with potential hazards that should be evaluated and cleaned so the property can be redeveloped. Therefore, an appropriate predemolition assessment and quantification of structure-associated hazardous material is essential. The proposed project involves conducting a thorough, accurate assessment of hazardous building materials contained on or within the Site's structures, and accurately delineating the extent of soil contamination. The condition of the remaining structures has deteriorated to the point where their demolition is the only feasible option to prepare the Site for redevelopment.

Previous building hazard evaluations of the Site were performed within the context of a screening level assessment and did not thoroughly address the presence of asbestos in roofing material and interior portions of buildings and other structures. These investigations did not evaluate the presence of PCB-caulk. The 2000-2002 EPA TBA report recommended further evaluation of the extent of hazardous materials in the following Areas of Concern:

- Horse Brook
- PCB-containing transformer enclosures
- The basement of the three-story building
- Former drum storage area

- Lead paint disposal area
- Rust proofing drag out trench
- Bonderizer sump;
- Former haz waste storage area

Metal plating area

Vapor degreaser area

The proposed project will accurately delineate the horizontal and vertical extent of soil and groundwater contamination. The proposed delineation will be sufficient to develop a Phase III Characterization Report and Remedial Action Plan for soil and groundwater that, once implemented, will meet CTDEEP guidance standards for pre-remedial assessment.

b. Budget for EPA Funding and Leveraging of Other Resources:

i. **Project budget:** The Town will use the EPA Assessment Grant funding to conduct pre-demolition ACM and hazardous material assessment of buildings and other structures and to determine the extent of soil contamination in six of the Site's most significant AOCs.

	P	roposed Budg	get		
Budget Category			Project Tasks	8	
Programmatic Costs	Task 1 Cooperative Agreement Oversight	Task 2 QAPP	Task 3 Hazardous Material Assessment	Task 4 Community Involvement and Planning	Total
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Town Voluntary Contribution	\$2,500	\$0	\$0	\$2,000	\$4,500
Contractual (Building Material Assessment) ¹	\$0	\$5,200	\$70,400	\$0	\$75,600
Contractual (Soil and Groundwater) ¹	\$0	\$6,000	\$118,400	\$0	\$124,400
Total EPA Funds	\$0	\$11,200	\$188,800	\$0	\$200,000

^{1.} Contracted services to be competitively bid

Budget Notes:

Task 1: Cooperative Agreement Oversight: The Town will prepare quarterly project status reports and financial data. The Town will include this data in the grant reporting documents, such as quarterly status and financial reports and updates to the Assessment, Cleanup and Redevelopment Exchange System (ACRES) through an estimated 12 quarters. The estimated budget for this task includes Town staff labor and supplies, and is based on the Town's previous experience managing state and federal grants awards.

	Proposed Task 1 Bu	dget
Activity/Output	Cost	Basis
Grant Reporting Labor	\$1,000	Support estimated by Town
(Town contribution)		

Grant Reporting Supplies	\$1,500	Supplies estimated by Town
(Town contribution)		

Task 2: Quality Assurance Project Plan (QAPP): A QAPP will be prepared to address collection and analysis of asbestos, lead-based paint, and other hazardous building material (PCBs and mercury), and collection and analysis of soil and groundwater samples for metals, PCBs, VOCs, and SVOCs. Costs are based on the experience of the Town's environmental professional.

	Proposed Task 2 Bi	ıdget
Activity/Output	Cost	Basis
QAPP Contractor Labor	\$11,200	118 hours labor at \$95/hour (average)

Task 3: *Hazardous Material Assessment*: Task 3 will include assessment of structure-associated hazards and delineation of the extent of hazardous materials in soil and groundwater.

Structure-associated-hazardous materials: Review and update previous asbestos and hazardous building material surveys. Conduct a hazardous materials inspection and assessment of the on-site structures, including the 70,100 SF one-story mill section and the 4,500 SF research building. The assessment will accurately quantify ACM, lead-based paint, PCB-containing caulk, and PCB and mercury-containing electrical and lighting equipment. Data from previous reports and the proposed structure-associated hazardous material inspection and assessment will be compiled into a comprehensive Site-wide structure hazardous material report that accurately represents the type, nature, and quantity of structure-associated hazardous materials on the Site.

Hazardous Materials in Soil and Groundwater: Soil and groundwater in the vicinity of the following AOCs will be collected and analyzed by state-licensed laboratories to determine the horizontal and vertical limits of associated contaminants:

AOC	Contaminants
Horse Brook (sediment in reservoir areas)	VOCs, VPH, EPH, SVOCs, PCBs, CT, 11
	RSR metals
Transformer enclosures (soil only)	PCBs, EPH
Basement of the three-story mill section (soil and	SVOCs
groundwater)	
Lead Paint Disposal Area (soil and groundwater)	Lead, Zinc, EPH, SVOCs
Basement Plating Area (soil and groundwater)	RSR 11 metals, cyanide, VOCs
Rust Proofing Drag Out Trench	VOCs, VPH, EPH
Bonderizer Sump	Lead, Zinc, EPH, SVOCs
Former Hazardous Waste Storage Area and Vapor	VOCs
Degreaser Area (soil, soil gas, groundwater)	

The soil and groundwater assessment activity will complete the horizontal and vertical delineation of soil and contamination. Data obtained through this task will be compiled into a Phase III report that meets the CTDEEP Site Assessment Guidance for preparation of a Phase III report and a Remedial Action Plan (RAP) or cleanup of the Site.

Pro	posed Task	3 Budget
Activity/Output	Cost	Basis ¹
Building Assessment Labor Review of previous building assessment investigation reports. Inspect buildings to inventory ACM, lead-based paint, and hazardous building materials. Collect samples for analysis. Prepare building assessment report, abatement specifications, and cost estimate.	\$49,300	Estimated, based on average labor rate of \$85 per hour for: • 80 hours to review and compile existing data; • 150 hours to assess the one-story mill building • 80 hours to assess the research building (310 hours total); • 270 hours for report, abatement specifications, and cost estimate. Total: 580 hours
Lift equipment to access roof field Analysis of asbestos bulk samples	\$12,600 \$5,500	14 days at \$900 per day 500 samples by Polarized Light Microscopy at \$7.00 per sample and 50 samples per building by Transmission Electron Microscopy at \$40 per sample.
Analysis of caulk samples for PCBs and wipe samples for mercury	\$3,000	50 PCB samples at \$50 each. 50 mercury samples at \$10 each.
Soil and Groundwater Assessment Analysis of soil samples for PCB, metals, SVOCs, VOCs, asbestos, and EPH Analysis of groundwater samples for PCB, metals, SVOCs, VOCs, and EPH	\$48,250	50 PCB samples at \$50 each 100 total metal samples for \$75 each 75 SPLP metal samples for \$100 each 100 VOC samples at 55 each 100 SVOC samples at \$130 each 100 EPH samples at \$115 each 75 asbestos samples at \$10 each
Collect soil and groundwater samples, prepare a Phase III Assessment Report and a Remedial Action Plan	\$70,150	Install 24 soil borings at \$200 each. Install up to 11 groundwater monitoring wells at \$600 each. 300 hours of field labor estimated, based on average labor rate of \$85/hour. 350 hours for Phase III Report and RAP based on average labor rate of \$95/hour

1. Labor and equipment costs estimated based on experience of the Town's Environmental Professional, laboratory costs based on quotations received from CT licensed laboratories.

Task 4: Community Involvement and Planning: This portion of the budget will be used to continue to engage the community through a variety of outreach mechanisms. This will include dedicating a portion of the Town's web page to assessment, cleanup, demolition and redevelopment activities at the Site, preparing a site-specific community relations plan, establishing an information repository, preparing fact sheets, holding two community meetings, providing opportunity for public comment on the assessment results, preparing written responses, respond to any related concerns raised by groups or individuals, and providing language translation services at public meetings.

Prope	osed Task 4 B	udget
Activity/Output	Cost	Basis
Community Involvement and Planning	\$2,000	Estimated by Town
Supplies (Town contribution)		

ii. <u>Leveraging</u>: The Town does not expect the proposed assessment activities to exceed the grant amount requested. The Town is committed to acquiring additional funding to demolish the existing structures. As of the date of submission of this grant proposal, Plainfield has been awarded the following grant to help fund the town's redevelopment and revitalization of the Site.

Grants Awarded for Site Redevelo	pment
HUD Economic Development Initiative Grant	\$248,000

c. Programmatic Capability and Past Performance:

i. Programmatic Capability:

The Town has effectively managed over \$5 million in grants in the past 15 years. The Town has in place multiple staff with the requisite expertise and qualifications. Both Economic Development Coordinator Shelley Hopkins and Community Development Director Kyle Collins have successfully administered a variety of federal and state grants, including HUD, ARRA, and STEAP monies. First Selectman Paul Sweet has overseen the implementation of millions of dollars in grant funding during his nine terms in office. Finance Director Kelly Vachon is very familiar with both federal and state grant administration. The Town has in place a procurement policy and recruitment policy to acquire additional expertise and resources as needed. The Town maintains a town-business preference policy for hiring contractors.

The Town has set up a financial management system for the state and federal grants. This system will be used for managing and tracking the EPA Assessment Grant funds. Financial records are reconciled daily by the Project Manager and monthly by the Town Finance Director.

Outside services and resources are obtained through a competitive sealed bidding process overseen by the Board of Selectmen. Requests for Proposal are issued; the responses are reviewed by the Board of Selectmen who make a recommendation for award. The successful bidder is then awarded a task order contract which is managed by the Board of Selectmen. The Town is currently successfully managing contracts for infrastructure improvements.

ii. Current EPA Brownfields Grants: The Town has no current EPA Brownfields grants. The Town has the management systems in place to successfully manage EPA Brownfields grants. These systems include procurement and management of the subcontracted services required for grant implementation, including hiring contractors though a competitive bidding and task order process. No money from the EPA cleanup grant or the Town's cost share has been or will be used to pay for grant administration services.

The Town has received no adverse audit findings from an Office of Management and Budget audit or any other audit, nor has the Town been required to comply with "high risk" terms.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Plan to Involve the Affected Community:

Town residents have been informed of the hazards represented by the Site through public meetings held by the EPA to present the findings of the TBA investigation.

The Town's community involvement program for work awarded under this assessment grant will be implemented by the Town Economic Development Commission (EDC). This program is not solely focused on soliciting input; it is also a means by which the public is educated as to the interdisciplinary approach needed for successful redevelopment of the Site. Through this program, residents can channel their thoughts, offer opinions on the proposed redevelopment of the Site and gain understanding of the redevelopment.

The EDC has reached out to citizen and business community organizations to solicit their support for the assessment grant. The Town will keep these organizations informed of the progress of the cleanup through direct contact and through monthly EDC meetings that are open to the public.

Brownfields Job Opportunities: Although no Brownfields Job Training Grants have recently been awarded in the communities surrounding Plainfield, nearby Quinebaug Valley Community College offers job training for the environmental industry. The Town will make a significant effort to ensure that local residents are afforded job opportunities through participation in site assessment and cleanup work by including a local hiring clause in the Site assessment contractor's contract.

b. Plans to Develop State and Local Agency Partnerships:

The Town intends to develop cooperative partnerships with the following state and local agencies to facilitate the success of the assessment, cleanup, and redevelopment of the Site. These agencies regulate activities that will take place at the site during redevelopment. The Town has already held meetings with the CTDEEP, and will remain in close contact with agency managers as site assessment and cleanup moves forward.

<u>Connecticut Department of Energy and Environmental Protection:</u> CTDEEP is responsible for regulation and oversight of the cleanup and redevelopment of contaminated sites through the *Voluntary Remediation Program*, the *Property Transfer Program* and the *Office of Brownfields Remediation and Development*. The Town has met with CTDEEP on several occasions to discuss the redevelopment and remediation of the Site.

<u>Connecticut Department of Economic and Community Development (DECD)</u>: DECD is the state's lead agency for the development and implementation of policies, strategies and programs designed to enhance Connecticut's communities and business and housing environments. The Town will submit an application to DECD to secure economic development grant funding and to develop and implement strategies to attract businesses and jobs to the redeveloped Site.

Northeastern Connecticut Council of Governments (NECCOG): NECCOG is a public agency, with representatives from 13 towns, formed to provide a basis for intergovernmental

cooperation in dealing with a wide range of issues facing Northeastern Connecticut. A member town, Plainfield will maintain close contact with NECCOG to apprise them of the progress of the Site assessment and cleanup and anticipated regional benefits from property redevelopment. A letter from NECCOG indicating its willingness to partner with the Town is contained in Attachment C1.

Northeast District Department of Health (NDDH): NDDH coordinates health issues within twelve towns in Northeastern Connecticut. Plainfield will coordinate with NDDH to keep them apprised of the progress of assessment and cleanup activities at the Site. NDDH will provide the Town and surrounding communities with public health education, assessment, and support, and will also provide technical and intermediary support needed for this project. A letter from NDDH indicating its willingness to partner with the Town is contained in Attachment C1.

c. Role of Key Community Based Organizations:

Letters of support from organizations affirming their support or describing their partnership role and commitment to the assessment, cleanup and redevelopment of the Site are contained in Attachment C2.

Northeastern Connecticut Chamber of Commerce (NCCC): NCCC works to build a positive business climate to meet current and future needs of the community, and to support balanced economic development and growth. The Town will work with NCCC to promote the availability of the redeveloped Site as a place that will provide a local and regional source of goods, services, and employment. A letter from NCCC indicating its support of the Town's efforts to redevelop the Site is contained in Attachment C2.

<u>The Last Green Valley, Inc. (TLGV)</u>: TLGV is a local non-profit organization whose mission is to preserve the region's irreplaceable land, water, and cultural resources. TLGV's role is to promote partnerships at the local, regional, state, and federal levels, and act as an educator/facilitator to motivate independent actions. TLGV manages a successful grant program that has distributed more than \$3.1 million to over 200 projects in every part of the region. A letter from TLGV indicating its support of the Town's efforts to redevelop the Site is contained in Attachment C2.

<u>Plainfield Historical Society:</u> The Society is dedicated to the preservation of the Town's history, in which the Site played a significant role. The Town will coordinate with the Society in recording, documenting, and preserving historic and prehistoric resources, and will look to the Society for guidance in selecting structures for reuse and preservation. A letter describing their role as a partner is Site redevelopment is contained in Attachment C2.

d. Letters of Support from Citizens:

A Town resident petition, as well as letters from Town residents and others in support of the Town's efforts to assess, clean up and redevelop the Site, are contained in Attachment C3. Also included is a letter of support from a developer with whom the Town has formed a relationship to redevelop the site.

PROJECT BENEFITS

a. Welfare and/or Public Health:

Achieving an accurate evaluation of ACM, lead and hazardous materials contamination in the Site's structures and an accurate delineation of soil contamination will facilitate abatement and demolition of structures and remediation of soil and groundwater, eliminating these health threats and enabling Site redevelopment. Redevelopment of the Site will benefit public welfare by:

- Eliminating the primary source of blight in the Village and encouraging surrounding businesses and residents to take greater care of their properties;
- Increase the value of homes in the surrounding neighborhoods;
- Eliminate one of the Village's key crime sites;
- Allow the Town to pursue flood mitigation activities that will enhance flood protection and provide a better quality of life for residents and lower costs for Village businesses;
- Remove hazardous contaminants on the Site that may be released to air, soil and groundwater thereby eliminating neighborhood health threats and protecting the Town's water supply.

b. Economic Benefits and/or Greenspace:

i. <u>Economic benefits:</u> The Site is the largest rail-accessible property in Plainfield Village. The Town's vision for the property is the creation of an economically and environmental sustainable mixed use facility that takes advantage of the existing easy access to both road and rail transportation.

Site redevelopment will spur economic revitalization of the surrounding commercially zoned areas and provide the economic stability necessary to sustain businesses.

Long-term local employment opportunities created through this transformation are expected to help reverse the trend of replacing highly skilled manufacturing and technical jobs with lower paying service jobs. Cleanup and redevelopment of the Site will provide a significant number of short-term local remediation and construction jobs.

Site redevelopment will provide a source of increased tax revenue to the Town, and remove a significant source of blight that has adversely affected the Town's efforts to attract new business investment in the Village and throughout the Town.

ii. <u>Greenspace:</u> Redevelopment of the Site provides significant opportunity for restoration of Horse and Mill Brooks, thereby improving water quality, the value of fish and wildlife habitat and creating greenspace.

c. Environmental Benefits

i. <u>Infrastructure Reuse/Sustainable Reuse:</u> The Site is currently serviced by high voltage (14KVA) electric service, and by public water, sewer, and gas services. This infrastructure will be reused in Site redevelopment.

The assessment grant will help develop an accurate assessment of reusable building materials. Recovery of wooden and metal building material for recycling and on-site

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crushing of masonry demolition debris (brick and block) for use as fill material or aggregate will return valuable materials to the industrial raw materials market and provide the Town with a source of funds for ongoing Site abatement and demolition activities.

ii. <u>Livability/Sustainability:</u> The Town's Plan of Conservation and Development (POCD) identifies the InterRoyal property as a Brownfield with potential hazards that should be evaluated and cleaned so the property can be redeveloped. The POCD calls for transit-oriented development at the Site. Public rail access exists from the adjacent Providence and Worcester rail line via an active rail spur that runs through the eastern portion of the Site. Recently streets have been repaved and new sidewalks installed to improve access to the redeveloped Site. Redevelopment will foster creation of new in-town jobs thereby reducing the need for out of town travel. This will result in lower consumption of gasoline and diesel fuel and reduce the amount of time lost to travel.

The Town's zoning regulations include a Planned Development District that provides flexibility on how the property is redeveloped, and encourages village-style mixed use commercial/residential development, particularly those with an affordable housing component.

Removal of the blighted Site building and environmental threats will 1) improve the property values of homes and business in the Village and surrounding neighborhoods; and 2) pave the way for a blight ordinance currently under consideration by the Town. This ordinance will be used to rid the town of unsightly, dangerously deteriorated buildings, which are primarily found in low-income urbanized areas such as Plainfield Village.

Redevelopment of the Site will facilitate leveraging of additional grant funding for flood control in the Village, with subsequent reductions in costs for insurance and increases in property values for businesses and residents.

Redevelopment of the Site will improve the quality of life for residents of the surrounding neighborhoods by relieving their anxiety that another mill fire will result in evacuation and may severely damage their homes. Site redevelopment will further increase property values and help retain residents who want cleaner, healthier living conditions.

a. Plan for Tracking and Measuring Progress:

The key output of this grant will be an accurate assessment of ACM, lead-based paint, and hazardous building materials in the Site's structures and delineation of lead, PAHs, and metals in the Site's soil and groundwater. Progress will be tracked via quarterly reports and ACRES property profile forms. Assessment results will be used to develop a Phase III assessment report meeting DEEP guidance requirements for pre-remedial assessment. The RAP will provide a detailed outline of abatement and soil and groundwater cleanup activities required to prepare the Site for redevelopment. These documents and grant status reports will be submitted to EPA and CTDEEP and will be available for public review in accordance with the Town's community relations plan.

ATTACHMENT A THRESHOLD DOCUMENTATION

TO ALL PEOPLE TO WHOM THESE PRESENTS SHALL COME: GREETING:

KNOW YE, THAT NATIONAL PLAINFIELD CORPORATION, a Corporation established under the laws of the State of Connecticut, for the consideration of TEN (10) DOLLARS and other good and valuable considerations received to its full satisfaction of ROYAL METEL MANUFACTURING COMPANY, a corporation established under the laws of the State of Delaware and qualified to transact business in the State of Connecticut. DOES, give, grant, bargain, sell and confirm unto the said ROYAL METAL MANUFACTURING COMPANY, its successors and assigns forever:

A certain tract or parcel of land with all buildings fixtures, reservoirs and railroad siding thereon, located in the Town of Plainfield, and State of Connecticut, bounded and described as follows:-

railroad siding thereon, located in the Town of Plainfield, and State of Connecticut, bounded and described as follows:

Beginning at the intersection of the southerly line of Railroad Avenue as laid out by the Connecticut Highway Department with the easterly line of the property of the Norwich and Worcester Branch of the New York, New Haven am Hartford Railroad and running from said point easterly along the southerly line of Railroad Avenue about two hundred Thirty Five and 4/10(235.4) feet to the center of the Town Brook, so-called; thence southerly, along the center of said Brook, about two hundred ten (210) feet; thence southeasterly along the center of said Brook about fifty six(56) feet to the northerly line of Mill Street; thence easterlyalong the northerly line of Mill Street one, hundred Seventy Six and 6/10 (176.6) feet to the southeasterly corner of land now or formerly of W.Payson Babcock, the last line abutting northerly on said Babcock land; thence turning an interior angle to the right of 89° 21' and running southerly a distance of fourteen hundred twenty four and 7/10(1424.7) feet, this line crossing Mill Street and running in part along the line of a wire fence; thence turning an interior angle to the right of 90° 6' and running one hundred ten and 5/10 (110.5) feet to a point on the westerly side of the Town Brook; thence deflecting 90° to the left and running twenty two(22) feet to the northeasterly corner of land sold by The Plainfield Corporation to the Plainfield Manufacturing Company, Uncorporated, the last three lines abutting easterly, southerly and easterly on land now or lately of The Plainfield Corporation; thence running westerly at right angles to the last mentioned line, one hundred seventy four and 8/10(174.8) feet; thence southerly at right angles nineteen and 8/10 (19.8) feet; thence westerly at right angles one hundred twenty eight and 2/10 (128.2) feet, the last three lines abutting southerly, easterly and southerly on land now or lately of said Plainfield hanufacturing Compa

Together with the railroad siding and the fence or fences, on, or on the boundary of, the parcel hereby conveyed and the foot bridge from Mill #1 running west over the railroad tracks and an easement to use the land of The Plainfield Corporation direction beneath said bridge and upon which it rests for the support, revair and use of said bridge.

use of said bridge.

Together with (a) the boilers, elevators, sprinkler system and electric lightinglines and reflectors now on said premises (b) the right in the grantee, its successors and assigns, in common with others, to use-for highway purposes, all street and
avenues situated on land now or formerly of The-Plainfield Corporation which have
not been accepted as public highways and which are reasonably necessary or desirable
for the convenient occupation and use of said premises. (c) the right in the grantee,
its successors and assigns, to use the northerly wall of the Mill Building located
just south of the premises hereb: conveyed for the support of the floor and other
beams, rafters and other supports for the Mill building herein conveyed and to use
and maintain said wall for the support of pines, conduits, wiring and other fixtures necessary or convenient in the use and maintenance of said Mill Building herein conveyed, and the right otherwise to use and maintenance of said Mill Building herein conveyed, and the right totherwise to use and maintenance of said wall as a party wall
between the Mill Building herein conveyed and said building next southerly, thereof;
together with the right to maintain and repair said wall and to enter upon the said
premises next south for such purpose, all as reserved in a deed from The Plainfield
Corporation to Plainfield Manufacturing Company, Incorporated, dated January 5,
1937 and recorded in the Plainfield Land Records in Volume 52, pages 158,159,160
and 161.

Said premises are subject to such rights of way over and easements in the premises herein conveyed as were granted to said Plainfield Manufactuting Company, Incorporated, in and by said deed.

Incorporated, in and by said deed.

This conveyance is made subject to the reservations contained in deed of the premises hereby conveyed from The Plainfield Corporation to the grantor herein, under its then name of The National Manufacturing Corporation, dated May 5,1939 and recorded with the Records of land Evidence in said Plainfield in Deed Book 55 at page 421, and subject also to three certain easements from the grantor to The Connecticut Light & Power Co., dated June 20,1940, July 16,1945 and June 23,1950 and recorded with said Records in Deed Book 56 at page 129, Deed Book 63,at page 17 and Deed Book 66 at page 628 respectively.

TO HAVE AND TO HOLD the above granted and bargained premises, with the privileges and appurtenances thereof, unto it the said grantee and its successors and assigns forever, to its and their own proper use and behoof.

And it the aforenamed grantor for itself and for its successors, does covenant with the said gr_{an} tee and its successors and assigns, that it will warrant and defend the aforedescribed premises to the said gr_{an} tee, its successors and assigns forever, against the lawful claims and demands of all persons claiming by, through or under it.

IN WITNESS WHEREOF, said National Plainfield Co poration has caused these presents to be signed and its corporate seal to be hereto affixed by its proper officer hereunto duly authorized this 31st day of May A.D., 1955.

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I hereby certify that United States Internal Revenue
Stamps to the amount of Dollars
were attached to this instrument and daily calicaled.
ATTEST:

Harry H. Zottu

In Presence of: William Lane Galevi Kaslon NATIONAL PLAINFIELD CORPORATION

BY: Sidney H.Gould President (COMPANY SEAL)

State of Connecticut County of New London

ss;

Norwich,

1955

Personally appeared SIDNEY H. COULD, Bresident of National Plainfield Corporation, signer and sealer of the foregoing instrument, and acknowledged the same to be his free act and deed, and the free act and deed of said National Plainfield Corporation, before me.

Allyn C.Brown Jr Notary Public (SEAL)

May 31.

Recorded June 1,1955 at 9:50AM

By Harry W Potter

Town Clerk

LEASE

THIS INDENTURE, MADE the 1st day of June one thous-

and nine hundred and Fifty-Five
BETWEEN JULIENNE DESPATHY of the Town of Plainfield in the County of Windham
and State of Connecticut, of the first part, and JUSEPH SZCZSPONIK, of the Town of
Griswold, in the County of New London and State of Connecticut, of the second part,

WITNESSETH, that the said party of the first part, for and in consideration of the rents and covenants hereinafter reserved and contained, and to be paid. kept and fulfilled on the part of the said party of the second part, has letter, and by these presents do grant, demise, and to farm let, unto the said party of the second part, one store, now being occupied by Despahty's Package Store, located on the boad leading from Wauregan to Brooklyn, in Wauregan, Town of Plainfield, County of Windham, State of Connecticut, and also storage apace in the celler underneath said store sufficient for the storage of stock in trade of a liquor or package store to be operated by the party of the second part on the leases premises, with the appurtenances, to have and to hold the same, for the term of One (1) year---from the lst day of June one thousand nine hundred and Fifty-Five at the hearly rent or sum of Five Hundred Twenty and no/100(\$520.00) Dollars, to be paid in equal weekly payments at the premises as follows, to wit: Ten Dollars on Wednesday, June 1,1955, and Ten (\$10.00) Dollars on each Wednesday thereafter until the termination of this lease.

AND IT IS AGREED, That if any rent shall be in arrear and unpaid by the space of Twn (10) days after the same shall be and become due and payable as aforesaid, or if default shall be made in any of the covements herein contained and to be kept and fulfilled on the part of the said party of the second part, then it shall be lawful for the said party of the first part at any time after such neglect or default, and without any previous demand or notice whatever, to re-enter and take possession of said leased premises, and such re-entry and taking possession shall end and terminate this lease.

AND the said party of the second part does covenant to pay to the said party of the first part, the said yearly rents as hereinbefore specified, and further that he will not, during said term, assign or under-let said premises or any part thereof without the permission in writing of the said party of the first part, and will not occupy the said premises for any business deemed extra hazardous without the like consent. And the party of the second part does hereby futher agree to do no waste, repair all broken window glass and all damage that may happen to gas and water pipes through the neglect or carelessness of himself or any of the occupants.

AND the said party of the second part does hereby further agree to comply and conform to all the laws of the State of Connecticut, and the by-laws, rules and regulations of the City or Town within which the premises hereby leased are situated, relating to health, nuisance, fire highways and sidewalks, so far as the premises hereby leased are or may be concerned, and to save the lessor harmless from all fines, penalties and costs 66r violation of or non-compliance with the same.

AND the said party of the second part does further agree that after default made in any of the covenants herein contained, the acceptance of rent or failure to reenter by the lessor shall not be held to be waiver of her right to terminate the lease, and said lessor may re-enter and take possession of said premises the same as if no rent has been accepted after such default.

AND the said party of the first does covenant and agree that the termination of this lease, said party of the second part shall have the right and option to renew this lease for four (4) successive terms of one (1) year each. AND both parties agree that holding over by the leasee at the end of each yearly term shall operate to renew this lease for another term of one year. It is further agreed that in no event shall this lease be effective for a period of more than five years from June 1st, 1955.

AND the party of the first part agrees to install a toilet bowl on the premises.

I,RICHARD K.GREGORY, residing at 68-04 Burns Street, in be City of New York, County of Queens and State of New York, hereby certify as follows:

- 1. That I am presently, and since January 2,1958, continuously have been, the Secretary of the Corporation presently bearing the corporate title "Royal metal Corporation", a Delaward Corporat
- That the aforesaid Royal metal Corporation, when organized in the State of Delaware, on May
- 2. That the actional Royal metal Corporation, when organized in the State of Delaware, on May 24, 1955, was organized under the name of Royal Netal Manufacturing Company".

 3. That the actional Royal Metal Namufacturing Company" filed a Certificate of Amendment with the Secretary of State of Delware changing its corporate title to "Royalmetal Corporation of Delaware" on January, 2,1962, Annexed hereto and made a part hereof is Certificate dated April 5,1963 from the Office of Secretary of State,of the State of Delaware.
- 4. That by Agreement of Merger filed with the Office of Secretary of State, of the State of Delaware, on December 22,1965, the corporate title of "Royalmetal Corporation of Delaware"was changed to "Royalmetal Corporation", under which corporate title the aforesaid corporation has been known since January 1,1966. Annexed hereto and made a part hereof is Certificate dated December 22,1965 of the Secretary of State, of the State of Delaware.
- 5. That the aforesaid corporation is the owner of certain real property situate in the Town of Plainfield, State of Connecticut, under Deed dated May 31, 1955, from National Plainfield Corporation to Royal Metal Manufacturing Company, recorded in the Office of the Town Clerk of Plainfield, in Book 74, at page 143-4, on June 1, 1955.
- That this Cortificate is tendered for filing to the Town Clerk of Plainfield, Connecticut, to indicate the changes of name hereinabove set forth.

IN WITNESS WHEREOF I have hercunto set my hand and seal this 23rd day of February, 1966.

Richard K.Gregory

STATE OF NEW YORK COUNTY OF NEW YORK

On the 23rd day of February, 1966, before me, personally came RICHARD K.GREGORY, to me known to be the individual described in and who executed the foregoing instrument and acknowledged that he executed the same.

County Clerk's Certificate of authority of officer taking acknowledgment wasattached to original instrument

Peter M.Gallucc Notary Public, State of New York No. 41-6450803 Queens County Certificate filed in New York County Term Expires March 30,1966(SEAL)

STATE OF DELAWARE OFFICE OF SECRETARY OF STATE.

I FLISHA C. DUKES Secretary of State of the State of Delaware, dohereby certify that the Certificate of Incorporation of the "ROYAL NETAL MANUFACTURING COMPANY", as was received and filed in this office the Twenty-Fourth day of May, A. D. 1955, at 9.0'clock AM/.

And I do hereby further certify that the said "ROYAL METAL MANUFACTURING COMPANY", filed a

Certificate of Agreement of Nerger on the twenty-sixth day of August, A.D. 1955, at 9 O'clock Am.

And I do hereby further certify that the said "ROYAL METAL MANUFACTURING COMPANY", filed

Certificate of Amendment changing its corporate title to "ROYALMETAL CORPORATION OF DELAWARE", on the second day of January, A.D. 1962, at 9 O'clock A.N.''

And I do hereby further certify that the aforesaid Certificates are the only Certificates on record of the aforesaid Corporation;

And I do hereby further certify that the Annual Reports have all been filed to date;

And I do hereby further certify that the aforesaid Corporation is duly incorposated under
the laws of the State of Delaware and is in good standing and has a legal corporate existence not
having been cancelled or dissolved so far as the records of this office show and is duly authorized

IN TESTIMONY WHEREOF, I have herounto set my hand and official seal at Dover this fifth day of April in the year of our Lord one thousand nine hundred and Sixty-Three (STATE SEAL)

Elisha C.Dukes Secretary of State

OFFICE OF SECRETARY OF STATE STATE OF DELAWARE

I,ELISHA C.DUKES Secretary of State of the State of Delaware, do hereby certify that the Certificate of Agreement of Nerger of the "ROYALMETAL CORPORATION OF CALIFORNIA", a Corporation organized and existing under the laws of the State of California, "ROYALMETAL CORPORATION of JAMES TOWN", a corporation organized and existing under the laws of the State of New York, "ROYALMETAL INNET, a corporation organized and existing under the laws of the State of New York, "NOYALMETAL CORPORATION", a corporation organized and existing under the laws of the State of Illinois, "DELUXE METAL PRODUCTS COMPANY", a Corporation organized and existing under the laws of the State of Dela ware, under the name of "ROYALMETAL CORPORATION", was received and filed in this office the twenty-Second day of December A.D. 1965, at 10 O'clock A.M.;

And I do hereby further certify that the aforesaid corporation shall be governed by the laws of the State of Delaware.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official scal at Dover this twenty-second of December in the year of our Lord one thousand nine hundred and Sixty-Five.

(STATE SEAL)

Elisha C.Dukes Secretary of State .F.Donna Asst.Secretary of State

Recorded February 28,1966 at 11:10 AM

Latricia Town Clerk arrel

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I, RICHARD K. GREGORY, residing at 68-04 Burns Street. in the City of New York, County of Queens, and State of New York, hereby certify as follows:

- That I am presently, and since January 2, 1958, continuously have been, the Secretary of the corporation presently bearing the corporate title "InterRoyal Corporation", a Delaware corporation.
- That the aforesaid corporation, when organized in the State of Delaware, on May 24, 1955, was organized under the name of "Royal Metal Manufacturing Company",
- That a certificate of change of name of the corporation was heretofore recorded with the Town Clerk of Plainfield, Connecticut, on February 28, 1966, in Book 89, at Page 1.
- That the corporate title of the aforesaid corporation was changed from "Royalmetal Corporation" to "InterRoyal Corporation" by the filing of a Certificate of Amendment of Certificate of Incorporation with the Secretary of State of Delaware on October 8, 1969. Annexed hereto and made a part hereof is a photocopy of Certificate of Amendment of Certificate of Incorporation for the aforesaid corporation, dated October 3, 1969 and filed with the Secretary of State of Delaware on October 8, 1969, together with Certification of the Secretary of State of Delaware dated October 8, 1969.
- That the aforesaid corporation is the owner of certain real property situate in the Town of Plainfield, State of Connecticut, under Deed dated May 31, 1955, from National Plainfield Corporation to Royal Metal Manufacturing Company, recorded in the Office of the Town Clerk of Plainfield, in Book 74, at Page 143-4, on June 1, 1955, and Deed dated December 19, 1968, from the Town of Plainfield to Royalmetal Corporation, recorded in the Office of the Town Clerk of Plainfield, in Book 96, at Pages 522-4, on December 27, 1968.
- That this Certificate is tendered for filing to the Town Clerk of Plainfield, Connecticut, to indicate the change of name from "Royalmetal Corporation" to "InterRoyal Corporation" as hereinabove set forth.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 2nd day of January, 1970 29844 (L.S.)

STATE OF NEW YORK COUNTY OF NEW YORK)

1:

Richard K. /Gregory 88:

On the 2nd day of January, 1970, before me personally came RICHARD K. GREGORY, to me known to be the individual described in and who executed the foregoing instrument, and acknowledged that he executed the same.
NANNA AKGULIAN

NOTARY PUBLIC. State of New o. 31-0030770 in New York

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CERTIFICATE OF AMENDMENT OF CERTIFICATE OF INCORPORATION

ROYALMETAL CORPORATION, a corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware, DOES HEREBY CERTIFY.

FIRST: That the Board of Directors of said corporation, by the unanimous written consent of its members, filed with the minutes of the Board, adopted a resolution proposing and declaring advisable the following amendment to the Certificate of Incorporation of said corporation:

RESOLVED, that the Certificate of Incorporation of ROYALMETAL CORPORATION be amended by changing the Article thereof numbered "FIRST" so that, as amended, said Article shall be and read as follows:

"The name of the corporation (hereinafter called the 'Corporation') is InterRoyal Corporation".

SECOND: That in lieu of a meeting and vote of stock-holders, the stockholders have given written consent to said amendment in accordance with the provisions of section 228 of The General Corporation Law of the State of Delaware.

THIRD: That the aforesaid amendment was duly adopted in accordance with the applicable provisions of Sections 242 and 228 of The General Corporation Law of the State of Dealware.

FOURTH: That this Certificate of Amendment of the Certificate of Incorporation shall be effective on January 1, 1970.

IN WITNESS WHEREOF, said ROYALMETAL CORPORATION has

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to	

Inquiry Report Bill# Unique_id Dist	PLAINFIELD Name Address City/State/Zip	Interest Date : 08/22/2012 Prop Loc/Veh.Info./Plan-Sew MBL/LINK # Flags	TOT Inst TOT Adj TOT Paid L,	Page :1 Tax Due Int Due /F/Bint Due	Balance Due Now Discount
1997-01-0002776-00 RP-02761	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR ROAD 02P/030A/0002 B-Tax/Lien	30,201.17 0.00 0.00	30,201.17 76,559.94 24.00	106,785.11 106,785.11 0.00
1998-01-0002710-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR ROAD 02P/030A/0 002 B-Tax/Lien	25,386.64 0.00 0.00	25,386.64 59,785.55 24.00	85,196.19 85,196.19 0.00
1999-01-0002737-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR RD 02P030A000 20000 B-Tax/Lien	26,353.26 0.00 0.00	26,353.26 57,318.32 24.00	83,695.58 83,695.58 0.00
2000-01-0002725-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR RD 2P/30A/2 B-Tax/Lien	27,370.76 0.00 0.00	27,370.76 54,194.11 24.00	81,588.87 81,588.87 0.00
2001-01-0002755-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR RD 2P/30A/2 B-Tax/Lien	27,879.50 0.00 0.00	27,879.50 50,183.09 24.00	78,086.59 78,086.59 0.00
2002-01-0002746-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR RD 2P/30A/2/ B-Tax/Lien	21,165.72 0.00 0.00	21,165.72 33,970.98 24.00	55,160.70 55,160.70 0.00
2003-01-0002728-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR RD 2P/30A/2/ B-Tax/Lien	23,011.88 0.00 0.00	23,011.88 33,827.46 24.00	56,863.34 56,863.34 0.00
2004-01-0002686-00 00431800	INTER ROYAL CORPORATION PO BOX 91 PLAINFIELD CT 06374	20 RESEVOIR ST 2P/30A/2/ B-Tax/Lien	24,186.72 0.00 0.00	24,186.72 30,112.46 24.00	54,323.18 54,323.18 0.00
2005-01-0002691-00 00431800 1	INTER ROYAL CORPORATION UPDIKE, KELLEY & SPELLACY HARTFORD CT 06123 C/O ATTY MARK ZIMMERMAN	20 RESEVOIR ST 2P/30A/2/ B-Tax/Lien	14,099.90	14,099.90 15,016.39 24.00	29,140.29 29,140.29 0.00
2006-01-0002707-00 00431800 1	INTER ROYAL CORPORATION UPDIKE KELLEY & SPELLACY HARTFORD CT 06123 C/O ATTY MARK ZIMMERMAN	20 RESEVOIR ST 2P/30A/2/ B-Tax/Lien	14,886.14 0.00 0.00	14,886.14 13,174.24 24.00	28,084.38 28,084.38 0.00
2007-01-0002719-00 00431800	INTER ROYAL CORPORATION UPDIKE, KELLEY & SPELLACY HARTFORD CT 06123 C/O ATTY MARK ZIMMERMAN	20 RESEVOIR ST 02P-030A-0002 B-Tax/Lien	14,808.04 0.00 0.00	14,808.04 10,439.67 24.00	25,271.71 25,271.71 0.00
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caused its corporate seal to be hereunto affixed and this Certificate to be signed by ARTIN ASLANIAN, its President, and attested by RICHARD K. GREGORY, its Secretary, this 3rd day of October, 1969.

ROYALMETAL CORPORATION ... CORPORATE SEAL

ROYALMETAL CORPORATION

DELAWARE 1955

ATTEST:

STATE OF NEW YORK

COUNTY OF NEW YORK

BE IT REMEMBERED that on this 3rd day of October, 1969, personally came before me, a Notary Public in and for the County and State aforesaid, ARTIN ASLANIAN, President of ROYALMETAL CORPORATION, a corporation of the State of Delaward, and he duly executed said certificate before me and acknowledged the said certificate to be his act and deed and the act and deed of said corporation and the facts stated therein are true; and that the seal affixed to said certificate and attested by the Secretary of said corporation is the common or corporate seal of said corporation.

IN WITNESS WHEREOF, I have hercunto set my hand and seal of office the day and year aforesaid.

NANNA AKGULIAN NOTARY PUBLIC STATE OF NEW YORK

Notary Public
NANNA AKCULIAN
NATARY KULLIC, Stato at New York
NOTARY KULLIC, Stato at New York
No. 31-0030770
Outslind in New York County
Outslind in New York 20, 1980

Vol 99

P9 416



*** Office of Steel Brigory of Steller

J. Eugene Bunting. Secretary of State of the State of Delaware, do hereby certify that the above and foregoing is a true and correct copy of Certificate of Amendment of the "ROYALMETAL CORPORATION", as received and filed in this office the eighth day of October, A.D. 1969, at 10 o'clock A.M.

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TOWN OF PLAINFIELD RESOLUTION

I, Louisa Trakas, of the Town of Plainfield, a municipality of the State of Connecticut, do hereby certify that the following is a true and correct copy of a resolution duly adopted at a meeting of the Board of Selectmen duly held and convened on October 15, 2012, at which meeting a duly constituted quorum of the Board of Selectmen was present and acting throughout and that such resolution has not been modified, rescinded, or revoked, and is at present in full force and effect:

WHEREAS, Connecticut General Statutes Sec. 22a-133dd authorizes a municipality or any licensed environmental professional employed or retained by a municipality to enter, without liability, upon any property within such municipality for the purpose of performing an environmental site assessment or investigation on behalf of the municipality provided at least one of five specified criteria are met; and,

WHEREAS, one of the criteria for entry onto a property by a municipality under Sec.22a-133dd is the reasonable finding by any official of the municipality that such investigation is necessary to determine if such property presents a risk to the safety, health or welfare of the public or a risk to the environment; and,

WHEREAS, the Town of Plainfield has, under the authorization of C.G.S. 22a-133dd, conducted previous environmental investigations of the InterRoyal property, including an EPA Brownfields Targeted Site Assessment, and determined that hazardous materials are present on the property; and,

WHEREAS, the Town of Plainfield intends to file an application with the US Environmental Protection Agency for a FY2013 Site Specific Brownfields Assessment Grant in order to further characterize the type and extent of hazardous materials on the InterRoyal property.

NOW, THEREFORE BE IT RESOLVED BY THE TOWN OF PLAINFIELD:

That the Town of Plainfield reasonably finds such investigation necessary to determine if the InterRoyal property presents a risk to the safety, health or welfare of the public or a risk to the environment. The First Selectman is hereby authorized and directed to give at least forty-five days' notice of such entry by certified mail to the last known address of record of the owner of the InterRoyal property, as required under C.G.S. Sec22a-133dd.

IN WITNESS WHEREOF, the undersigned has affixed his/her signature and the corporate seal of the Town of Plainfield this 1674 day of October, 2012.

Louisa Trakas, Town Clerk

Louisak Malas

ATTACHMENT B STATE LETTER



August 23, 2012

Shelley Hopkins
Economic Development Coordinator
Town of Plainfield
8 Community Avenue
Plainfield, CT 06374

Subject: State Letter for Town of Plainfield's Brownfields Assessment Grant Application

Dear Ms. Hopkins,

The Remediation Division of the Connecticut Department of Energy and Environmental Protection acknowledges that the Town of Plainfield has stated its intent to conduct and/or oversee site assessment activities if Brownfields grant funds for assessment, as authorized by the Small Business Liability Relief and Brownfields Revitalization Act, signed into law on January 11, 2002, are awarded by EPA.

If the Town of Plainfield receives assessment grant funding for hazardous substances, pollutants or contaminants (including substances co-mingled with petroleum), the Town of Plainfield intends to conduct assessment activities at Former InterRoyal Mill Property.

If petroleum assessment grant funds are awarded by EPA, DEEP or EPA must determine the eligibility of each petroleum site before any site specific assessment activity is undertaken by the Town of Plainfield using the petroleum assessment grant funds.

DEEP guidance pertaining to assessment activities

DEEP expects that any assessment work conducted by the applicant identified above using Brownfields grant funding will be conducted in accordance with prevailing standards and guidelines for the type of assessment work being performed, including but not limited to the following DEEP Guidance Documents:

- The 2007 Site Characterization Guidance Document (SCGD), effective September 1, 2007 (revised 2010), which is available from the DEEP website at http://www.ct.gov/dep/lib/dep/site-clean-up/guidance/Site-Characterization/Final-SCGD.pdf, and
- The May 2009, the Laboratory Quality Control Assurance and Quality Control, Data Quality Assessment and Data Usability Evaluation Guidance Document (DQA/DUE Guidance), which is available from the DEEP website at http://www.ct.gov/dep/lib/dep/site_clean_up/guidance/qaqc/final_dqa_due.pdf

Additional important QA/QC information is available from the DEEP Quality Assurance and Quality Control Guidance webpage at http://www.ct.gov/dep/cwp/view.asp?a=2715&q=324958&depNav_GID=1626

The requirements stated above would be in addition to any requirements imposed or required by EPA, should the applicant be selected to receive Brownfields funding from EPA.

Shelley Hopkins Town of Plainfield Page 2 of 2

If you have any questions about this letter, please contact me at (860) 424-3800 or by e-mail at Baffour.Kyei@ct.gov. Good luck with your application.

Sincerely,

Baffour Kyei

Remediation Division

Bureau of Water Protection & Land Reuse CT Department of Environmental Protection

BK:bk

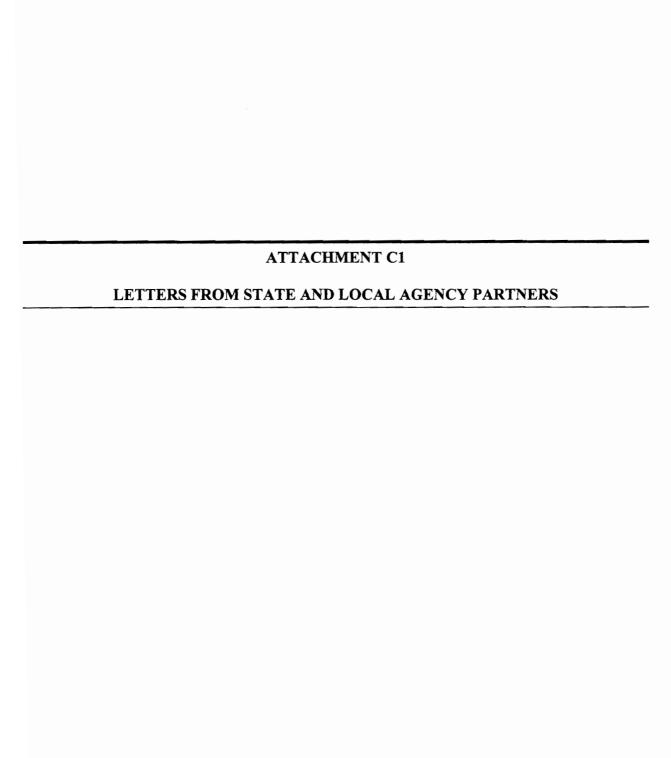
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ATTACHMENT C LETTERS OF SUPPORT

Attachment C1 Letters from State and Local Agency Partners

Attachment C2 Letters of Commitment and Support from Key Community Organizations

Attachment C3 Letters of Support from Citizens



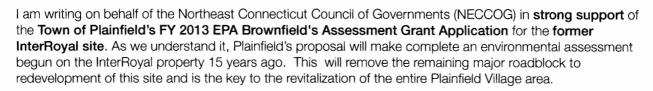
NECCOG

northeastern connecticut council of governments

November 14, 2012

Ms. Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square – Suite 100 Boston, MA 02109-3912

Dear Ms. Kelley:



Union

Ashford

Woodstock

Pomfret

Brooklyn

Plainfield

Eastford

Thompson

Putnam

Killingly

The InterRoyal site is located in the Plainfield Village section of Plainfield. The site itself is an eligible site under the Enterprise Corridor Program (which NECCOG coordinates for nine towns in the Region) and Plainfield Village is a former mill village with higher than average rates of poverty, unemployment and less than adequate housing. Additionally, Plainfield, as a town, is classified as a "Distressed Municipality." The clean-up and redevelopment of the InterRoyal site is fundamental to the revival of Plainfield Village in terms of employment, quality of life and will be a further centerpiece to the Town's well-being.

The proposal put forth by the Town is consistent with their Plan of Conservation and Development, the Region's goals, Connecticut's Plan of Conservation and Development and the Region's Comprehensive Economic Development Strategy. Additionally, the InterRoyal site is located on the Providence and Worcester Railroad and more specifically at the intersection of their line that leads south to the Norwich/New London Area and the line that goes west to Willimantic and the New England Central Rail Line. When cleaned and operational again - the InterRoyal site has the potential to be an inland port - generating revenue for the Town and jobs for its people.

Finally, NECCOG is fully committed to partnering with the Town of Plainfield to ensure the successful implementation of the proposed EPA Brownfield's Assessment Grant. NECCOG has in place planning, engineering and GIS staff to assist the Town.

Thank you for your consideration of our comments. Please do not hesitate to contact me should you need any further comment or details.

Executive Director



Northeast District Department of Health

69 South Main Street, Unit 4, Brooklyn, CT 06234 860-774-7350 / Fax 860-774-1308 <u>www.nddh.org</u>

November 15, 2012

Ms. Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square – Suite 100 Boston, MA 02109-3912

RE: Town of Plainfield EPA Brownfields Assessment Grant Application for FY 2013

Dear Ms. Kelley:

I am writing on behalf of the Northeast District Department of Health in support of the Town of Plainfield's FY 2013 EPA Brownfields Assessment Grant Application.

As the health district for the Town of Plainfield, it is NDDH's mission to promote, protect, and improve the health of the Town's residents by monitoring health concerns, preventing illness and encouraging healthy lifestyles. NDDH understands that the important role of public health in improving physical and mental health as well as social and economic well-being. The NDDH conducts community education and campaigns to increase awareness of the risks associated with lead, asbestos, and other contaminants, as well as the importance of maintaining a clean water supply. NDDH has worked on several projects related to environmental health including drinking water safety, hazardous material spills, protection of the environment during planning and development, and responding to environmental concerns of residents. NDDH has a long history of working collaboratively with partners in the region including town leaders, elected officials, businesses and institutions as well as state and federal agencies.

The former InterRoyal site poses numerous health risks to the residents of the low-income neighborhoods in its immediate vicinity. The site's structures are known to contain asbestos, lead, PCBs, and mercury. The soil and groundwater are contaminated with volatile organic compounds, polycyclic aromatic hydrocarbons, petroleum, and a number of metals, including chromium and nickel. The abatement and remediation of these hazardous materials before they migrate is crucial to ensuring the future well-being of Plainfield Village residents.

The InterRoyal site dominates Plainfield Village, both physically and economically. Its redevelopment is pivotal to the health—including economic health—of the community. This is a community whose declining health care is directly related to the downturn in the economy.

According to the 2012 Windham County Healthcare Consortia Community Needs Assessment, 10.5% of residents do not have access to healthcare, while 12.2% indicated they have experienced a time in the last 12 months when they needed but could not afford to seek medical care. Clean-up and redevelopment of InterRoyal and will help improve these statistics.

Should the Town of Plainfield receive an EPA Brownfields Assessment Grant, NDDH will partner with the Town and assist with outreach efforts to help the community better understand what the assessment process entails and what it means for residents. Given the unfortunate history of this property, including the massive fire in 2005, which released airborne asbestos and lead throughout the Village, residents will understandably be concerned about any activity that takes place on the site. NDDH will work with the Town to develop and distribute "What You Can Expect" or FAQ materials for residents. NDDH will also co-host informational meetings with the Town to address the health-related concerns of Village residents.

I strongly recommend that the Town of Plainfield be awarded a 2013 EPA Brownfields Grant.

Sincerely,

Susan Starkey, MS RD MPH

Director of Health

ATTACHMENT C2

LETTERS OF COMMITMENT AND SUPPORT FROM KEY COMMUNITY ORGANIZATIONS



Northeastern Connecticut Chamber of Commerce

3 Central Street, Danielson, CT 06239-2853 (860) 774-8001 FAX (860) 774-4299 www.nectchamber.com

November 26, 2012

Ms. Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square – Suite 100 Boston, MA 02109-3912

Dear Ms. Kelley:

I am writing on behalf of the Northeastern Connecticut Chamber of Commerce (NCCC) in strong support of the Town of Plainfield's FY 2013 EPA Brownfields Assessment Grant Application for the former InterRoyal site.

The Northeastern CT Chamber's mission is to promote the increased growth and profitability of business in the ten-town region it serves. Plainfield is one of the towns whose businesses our programs and services support. Unfortunately, the State of Connecticut classifies Plainfield as a "Distressed Municipality." Plainfield Village, where the former InterRoyal site is located, is particularly negatively impacted by unemployment, poverty, blight, and aging housing stock. Sadly, a number of small businesses that have attempted to establish themselves in this decaying neighborhood have failed; empty storefronts sandwich the remaining businesses that survive. Village residents must go outside the Village for the vast majority of their everyday needs. Even the Village library has been closed because the community lacks the resources to support it.

The InterRoyal site is the dominant commercial property in the Village; the Village's decline will not be reversed unless InterRoyal is cleaned up. It is our understanding that the Town of Plainfield is in discussions with a developer who is interested in redeveloping the site once it is cleaned up. Redevelopment of this key property is sure to stimulate renewed interest in the surrounding commercial properties in the Village, particularly given the Village's close proximity to rail transit and Interstate 395 and 95.

Should the Town of Plainfield be awarded an EPA Brownfields Assessment Grant, the NCCC is committed to assisting the Town to develop an outreach and marketing plan to apprise the regional business community of the assessment efforts taking place on the site as well as the business opportunities that will result from site clean-up and redevelopment. The NCCC will partner with the Town to host Business after Hours events with the Town to generate ground-floor interest in the Village revitalization plan. NCCC will provide introductions and work leverage assistance from local lenders and other organizations to help match prospective businesses with the tools and resources they need to succeed as part of the Plainfield Village revitalization initiative.

Connecticut's Northeast



October 25, 2012

Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square - Suite 100 Boston, MA 02109-3912

Re: FY 2013 Brownfields Assessment Grant Inter-Royal Property, Plainfield, CT

Dear Ms. Kelley:

The Last Green Valley, Inc. (TLGV) supports the Town of Plainfield's application for a Brownfields Assessment Grant for further assessment of the InterRoyal property. Plainfield is located within the Quinebaug and Shetucket Rivers Valley National Heritage Corridor, which is managed by TLGV.

While a considerable amount of assessment and risk-reduction work has been completed at the InterRoyal site, additional assessment is necessary in order to develop a good estimate of site cleanup costs and attract a developer. Without the additional work, this site will continue to sit vacant, posing a risk to the health, safety, and welfare of the community.

Redevelopment of the InterRoyal site is consistent with and supports many of the Visions and Strategies in TLGV's 10-year management plan for the National Heritage Corridor, including the following: support municipalities and property owners cleaning up contaminants without compromising The Last Green Valley's natural and cultural resources; identify, reuse and revitalize historic districts, village centers and buildings including mills; promote the repurposing, as feasible, of old industrial structures that retain a dominant visual and psychological impact within communities; and guide community plans to encourage mixed land uses where appropriate.

TLGV will continue to support redevelopment of the InterRoyal site through implementation of the management plan for the National Heritage Corridor. TLGV can offer meeting space, project promotion, small grant opportunities (pending availability of funds), and land use education for municipal boards.

TLGV is pleased to support Plainfield's efforts to redevelop this property. It is critical for this type of project to succeed if The Last Green Valley is to retain its unique cultural and natural resources. This is an important project not only to the town, but to the entire National Heritage Corridor. Please contact me if you have any questions or need additional information.

Sincerely,

Lois Bruinooge

Deputy Executive Director

I strongly urge the EPA to award the Town of Plainfield FY 2013 EPA Brownfields Assessment Grant funding so that the one remaining roadblock to rebuilding Plainfield Village can be eliminated.

Sincerely,

Elizabeth M. Kuszaj

Executive Director



Plainfield Historical Society

P.O. Box 104 Central Village, CT 06332

November 9 2012

Ms. Diane Kelley
Regional Brownfields Coordinator
US Environmental Protection Agency Program Region 1
U.S. EPA 5 Post Office Square – Suite 100
Boston MA 02109-3912

Re: Brownfield Assessment Grant for InterRoyal property in Plainfield CT

The Plainfield Historical Society supports the town's plan to complete the environmental assessment of the InterRoyal property through an EPA Brownfields Assessment Grant. We are interested because it is in the Lawton Mill National Historic District. The buildings that were destroyed by fire are not salvageable. In its present condition, even historical memorial plans at the site cannot be made.

The society would like to document and preserve any historic artifacts found on the site. A 1909 iron fence exists on the Railroad Avenue border of the property. It should be preserved, and ideally reused around a small park created there. This would be dedicated to the men and women workers in the textile mill.

An active railroad exists along the western edge of the mill ruins. It was an essential part of the mill operation. The crossing of two railroad lines was called Plainfield Junction. Increased commercial and tourist rail traffic is possible if the site is redeveloped. The Lawton Mill created the village of Plainfield, used the railroad and made a local historic impact.

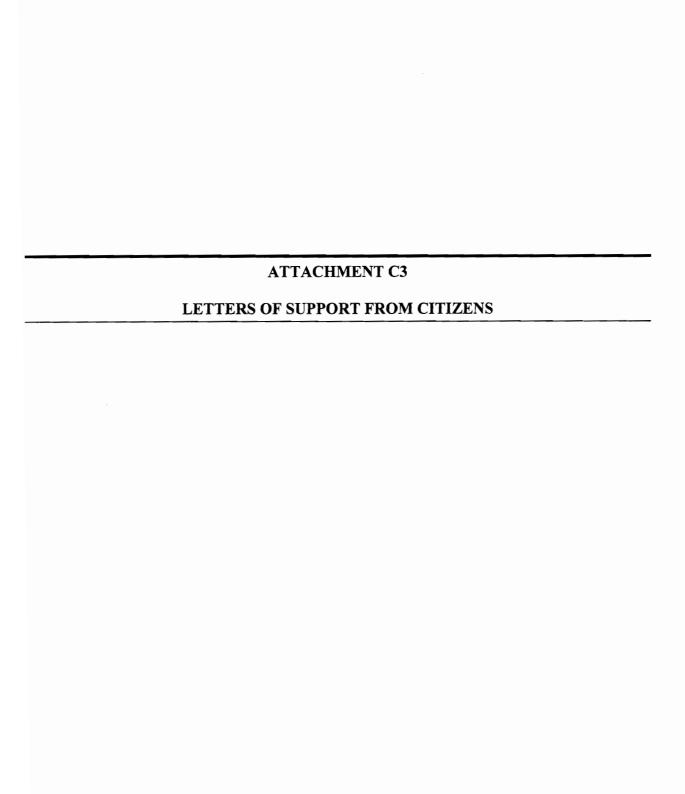
As Municipal Historian, the Plainfield Historical Society preserves and promotes the history of the town. An EPA Brownfields Assessment Grant for the InterRoyal site is consistent with our mission and will allow the Town to move forward with the reuse of this important site To disseminate information to the community about the Town's assessment activities, we are committed to covering this in our newsletters, at our meetings and at our booth in the annual Plainfield Pride Day, which attracts thousands of attendees.

We look forward to being informed of the process

Ruth Bergeron, President Plainfield Historical Society

Buth Bergeron

860 564 8561



Dear, Ms Kelley

I am writing you as a concerned citizian of Plainfield CT. I have lived in the town of Plainfield my entire life. From the time Plainfield Village was booming with industry till those industries closed down and left these mills vacant. Interroyal and Pervel once a source of employment and revenue now an eye sore and safety concern. Back in the summer of 2005 a fire destoyed a major portion of Interroyal. I was coaching my two sons and their baseball team when we saw black smoke billowing into the sky. My home is located behind the mill from the Little League Complex and we thought our house was on fire. Unable to get directly home my family was terrified. My wife and two young boys watched for hours in the dark will the mill burnt to the ground. Thankfully no one was injured. The fire was ultimately contained but a large portion of the Interroyal and Pervel remain. Many residents are still on edge about the condition of remaining buildings and surroundings. Chemicals and contaminats are in there, fire could be catastrophic. The smoke and ash could be seen many miles away from the site. These concerns are not only for Plainfield but neighboring towns. Our schools were closed and people remained indoors untill it was safe to breathe the air.

Many families like my own enjoy spending time at the Lions Park and the Little League Complex. The parks are our only recreational facilities in town and need to be safe. Any health hazards must be addresseed to ensure the saftey of our community. The people of Plainfield our proud and responsible, we need help to remediate these problems with mill sites. Growing up across the street from the mills, we would play around the mills. There was a paint pond behind the mill, where we would throw rocks into, many different colors would rise to the surface. Those ponds are now buried. Friends parents have died at a young age of cancer who have worked at the mills. Coincidence or chemicals? I'm not sure but let's make sure it not the remnant's of Pervel or Interroyal.

It's been seven years since the mill burnt and the site remains a hazard and undeveloped. Plainfield needs economic development to help provide the residents of Plainfield with growth and stability. Please consider the people of Plainfield when deciding to provide us with necessary funds to better our community and protect our future. Thank you.

Sincerly,

Michael A. Combies

Villa Maria Nursing and Rehabilitation Community, Inc.

-- "WE CARE" -

20 Babcock Avenue • Plainfield, Connecticut 06374 (860) 564-3387 • FAX (860) 564-6651

November 12, 2012

Ms Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square – Suite 100 Boston, MA 02109-3912

I am writing in support of the Town's FY 2013 EPA Brownfields Assessment Grant Application. I am the Owner and the Administrator for Villa Maria Nursing and Rehabilitation. We are a 62 bed skilled nursing facility. My building sits within 350 feet of the actual InterRoyal building that burned down in 2005. We are located across the street from the property.

My husband and I have operated the skilled nursing facility since 1994. We purchased the building the day after the enormous fire that burnt InterRoyal to the ground in the spring of 2005.

We have always prepared for the day that InterRoyal would burn. We have always been an industry that plans on "protecting in place". Every safety measure in our building was in place and operating with the intention of protecting in place. Each year we would do a fire and safety inservice based on the assumption that InterRoyal would burn. Most of the old mills have burned. We were concerned with asbestos and lead debris released during fire, threat of building catching on fire, and the fact that we serve a particularly vulnerable population. We were very lucky that the wind on the day of the fire pointed north. It still brings tears to my eyes and a large amount of anxiety looking back at the disaster that we avoided that day.

I was having dinner with my family when I received a call that there was smoke and flames coming from the InterRoyal building. I drove from my home in Killingly down 395 clearly seeing a plume of smoke rising above the trees most of 15 or so miles to Plainfield and the Villa Maria. Fire trucks were everywhere. Plainfield brought a fire truck to the Villa Maria and parked where they could wet the roof and east-facing wall of the facility. The area against the east wall was so hot that you could not stand near it. The patients were moved to the west end of the building and the fire doors in the building were shut. The air exchange system was shut down and windows were closed to the smoke. Families were called, staff not already on duty were called in to help with evacuation if the need arose. Like I said, we were extremely lucky. The wind blew north. The next day the bank that we were to close with sent insurance adjusters down to the facility to determine if it was wise to lend us the money needed to purchase the facility. The closing was the day after the fire. We purchased the facility that day and our need is still great.

The welfare of our facility is at risk each and every day. The property has been left abandoned and we are aware of instances of vandalism, crime, and illegal dumping on this property.

The property is overgrown and the ponds that in the past cooled the InterRoyal business, now flood regularly. My laundry department is at ground level and in the past was dry at all times. It now floods regularly as the ponds and small stream block up with ice and debris. We have had to spend quite a bit of money to run drains that cannot keep up with the water that was suppose to be fixed years ago. I cannot imagine what chemicals the water, previously used as cooling ponds, have in them that are certainly harmful to my staff, patients, and property.

A once beautiful property is now in a sad state of neglect. Prospective clients and their families express concern to about the location's safety since it is so close to InterRoyal. I can't imagine that resale property on my building would be all that attractive to prospective purchasers should I choose to sell the business. The environment is a continued threat to my business and the frail elderly that live here. We are in continued threat of contamination from another fire to the portion of the building that still exists, building collapse or as yet unknown contamination path as well as a blighted landscape.

What can you do? Please award funding to Town of Plainfield to clean up the InterRoyal property. Something must be done soon. Please call me with any questions.

Sincerely

Cindy Disco

Owner/Administrator

Villa Maria Nursing & Rehabilitation Community, Inc.

20 Babcock Ave

Plainfield, CT 06374

(860)564-3387

villamaria@ct.metrocast.net

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Action Supported	Summary and Background
We, the undersigned, are concerned citizens who support the Town of Plainfield's FY2013 Environmental Protection Agency Brownfield Assessment Grant Application for funding to complete the assessment of hazardous materials on the InterRoyal site	Abandoned almost 30 years ago, in its current condition the InterRoyal mill represents a health and public safety hazard to the community. Contaminants on the site pose a major roadblock to redevelopment of this property. Until these contaminants are identified and remediated, the property cannot be redeveloped and put back on the tax rolls.

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Show Your Support for the Town of Plainfield's FY2013 EPA Brownfield Assessment Grant Application For InterRoyal

Action Supported	Summary and Background
We, the undersigned, are concerned citizens who support the Town of Plainfield's FY2013 Environmental Protection Agency Brownfield Assessment Grant Application for funding to complete the assessment of hazardous materials on the InterRoyal site	Abandoned almost 30 years ago, in its current condition the InterRoyal mill represents a health and public safety hazard to the community. Contaminants on the site pose a major roadblock to redevelopment of this property. Until these contaminants are identified and remediated, the property cannot be redeveloped and put back on the tax rolls.

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Show Your Support for the Town of Plainfield's FY2013 EPA Brownfield Assessment Grant Application For InterRoyal

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We, the undersigned, are concerned citizens who support the Town of Plainfield's FY2013 Environmental Protection Agency Brownfield Assessment Grant Application for funding to complete the assessment of hazardous materials on the InterRoyal site	Abandoned almost 30 years ago, in its current condition the InterRoyal mill represents a health and public safety hazard to the community. Contaminants on the site pose a major roadblock to redevelopment of this property. Until these contaminants are identified and remediated, the property cannot be redeveloped and put back on the tax rolls.

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	Brownfield Assessment Grant Application for funding to complete the assessment of hazardous materials on the InterRoyal	We, the undersigned, are concerned citizens who support the Town of Plainfield's FY2013 Environmental Protection Agency	contaminants are identified and remediated, the property cannot be redeveloped and put back on the tax rolls.	the community. Contaminants on the site pose a major roadblock to redevelopment of this property. Until these	Abandoned almost 30 years ago, in its current condition the InterRoyal mill represents a health and public safety hazard to

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Action Supported We, Brov	We, the undersigned, are concerned citizens who support the Town of Plainfield's FY2013 Environmental Protection Agency Brownfield Assessment Grant Application for funding to complete the assessment of hazardous materials on the InterRoyal site

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Action Supported	Summary and Background
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Show Your Support for the Town of Plainfield's FY2013 EPA Brownfield Assessment Grant Application For InterRoyal

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Plainfield Police Department

"Honorable Service"

Chief of Police Michael G. Surprenant

210 Norwich Rd. Plainfield, CT 06374 (860)564-0804 fax (860)564-0808

Email: m.surprenant@plainfieldctpolice.com

November 8, 2012

Ms. Diane Kelley
Regional Brownfields Coordinator
US Environmental Protection Agency Region 1
U.S. EPA 5 Post Office Square – Suite 100
Boston, MA 02109-3912

Dear Ms. Kelley:

I am writing in strong support of the Town of Plainfield's FY 2013 EPA Brownfields Assessment Application for the former InterRoyal site.

This abandoned former textile mill represents an ongoing threat to the safety and welfare of the almost 3000 Plainfield Village residents who live within one mile of the site. The mill attracts not only thieves in search of scrap metal, but also bored teens looking for something to do in this run-down, economically hard hit neighborhood. Hardly a week goes by that the Police Department does not respond to a report of a trespasser on the InterRoyal property. The building that survived the massive 2005 fire has been deemed structurally unsafe and is known to contain numerous hazardous materials, as documented by the EPA. My officers are at risk every time they are called to conduct an investigation on the site. The threat of another act of arson like the one that caused the 2005 fire remains very real—and residents know it. They worry about the long-term effects of exposure to the asbestos and lead debris they found in their yards after the fire. They worry about another fire. In 2005, after wholesale evacuations, some 20 fire departments from surrounding towns, fighting the massive blaze together, managed to save the surrounding neighborhood. Next time Plainfield Village might not be so fortunate. I urge the EPA to fund the Town's application so that we can avoid the potentially devastating consequences of another fire and complete the assessment of the property that began 15 years ago.

Sincerely,

Michael G. Surprenant

Chief of Police



The Plainfield Town Hall 8 Community Avenue Plainfield, CT 06374

> Paul J. Yellen Fire Marshal

PH. (860) 230-3013 FAX (860) 230-3033 pyellen@plainfieldct.org

PLAINFIELD - CENTRAL VILLAGE - MOOSUP - WAUREGAN

October 15, 2012

Ms. Diane Kelley Regional Brownfields Coordinator US Environmental Protection Agency Region 1 U.S. EPA 5 Post Office Square - Suite 100 Boston, MA 02109-3912

RE: InterRoyal Complex, Plainfield, CT

Dear Ms. Kelly:

I am writing this letter in enthusiastic support for the Town of Plainfield's request for funding from the Brownfields program. As Fire Marshal, Emergency Management Director and Deputy Fire Chief I have been intimately involved with this site during my 24 year tenure in Town. I have been involved with interior firefighting and incident management of every fire emergency this site has experienced since it closed. Over the years each fire has been more severe than the last ultimately leading to the arson fire that destroyed the north portion of the building in 2005.

Both the EPA and Connecticut DEEP have expended millions of dollars in remediation funding after fire and haz-mat incidents at this site and, unless pro-active actions are taken, will likely be obligated to spend even more after the next incident here in an effort to protect the community after an emergency. While the site has been fenced in after the last fire, the scene is not secure and intruders enter the property on a regular basis. The arson fire in 2005 was ignited by persons who explored the property frequently and could have easily become trapped as the fire grew after it was set. The remaining structures on the property are an attraction for the same type of behavior.

These weather damaged buildings will, without intervention, likely burn down or fall down. It's not a question of "if", but rather "when" it will occur. Our modest request for \$200,000.00 will assist the Town of Plainfield to be pro-active in our efforts to address this hazard located in the village center, surrounded by hundreds of family dwellings, nursing homes, schools and essential businesses.

Thank you for your kind attention to our request.

1 Mille

Sincerely,

Paul L Yellen

Fire Marshal / Emergency Management Director

Equal Opportunity Employment Fair Housing Opportunity



November 20, 2012

FOUNDED 1844

Ms. Diane Kelley
Regional Brownfields Coordinator
US Environmental Protection Agency Region 1
U.S. EPA 5 Post Office Square – Suite 100
Boston, MA 02109-3912

Dear Ms. Kelley:

I am writing on behalf of the Providence and Worcester Railroad Company ("P&W") in strong support of the Town of Plainfield's FY 2013 EPA Brownfields Assessment Grant Application for the former InterRoyal site.

P&W is a regional freight railroad operating in Massachusetts, Rhode Island, New York and Connecticut. P&W transports a wide variety of commodities including chemicals, lumber, processed foods, and iron and steel products for some 160 customers. We also serve an approved customs-bonded intermodal yard for the movement of container traffic from the Far East destined for points in New England. Our customers include manufacturers of consumer goods, industrial plants, and energy and distribution facilities. When operations were active at the InterRoyal site first, as a textile mill and later, as a furniture manufacturer, P&W, which operates on a right-of-way located along the western boundary of that property, played an integral role.

Today, the 16+ acre InterRoyal site remains ideally suited for freight service. Located in the heart of Plainfield Village; the site is also well-situated to accommodate future passenger service. We see a growing demand for passenger rail service in the area and anticipate future opportunities to partner with other entities to address this burgeoning market.

P&W is highly supportive of an initiative that has the potential to return the InterRoyal site to productive use and to restore active rail service to locations in and around Plainfield Village. The infrastructure is already in place and ready to be capitalized upon. Our customers are our best partners and we look forward to a time when we can work with the Town of Plainfield and a future redeveloper of the InterRoyal site to develop the most efficient and effective transportation solutions for them and the community.

Sincerely,

David Fitzgerald

Vice President Operations

PROVIDENCE AND WORCESTER RAILROAD COMPANY

75 HAMMOND STREET, WORCESTER, MA 01610

P.O. BOX 16551, WORCESTER, MA 01801

TELEPHONE (508) 755-4000

October 24, 2012 560 Main Street Willimantic, CT 06226

Ms. Diane Kelley
Regional Brownfields Coordinator
US Environmental Protection Agency Region 1
U.S. EPA 5 Post Office Square – Suite 100
Boston, MA 02109-3912

RE: Town of Plainfield FY 2013 EPA Brownfields Assessment Grant Application:

Dear Ms. Kelley:

I am writing in strong support of the Town of Plainfield's application for FY 2013 EPA Brownfields
Assessment Grant to complete the environmental assessment of the former InterRoyal site in order to
prepare a remediation plan and redevelop the site.

In 2008, I formed an LLC, Plainfield Development, to enter into an agreement with the Town to purchase the municipal tax liens on the InterRoyal property for one dollar. My plan called for a phased redevelopment of the property as a mixed use site using the Town's multiuse Planned Development District zoning regulations.

My company's willingness to foreclose on the property is directly tied to the Town's ability to fill in data gaps that exist from previous Phase I, Phase II and TBA investigations of the site. Filling in these data gaps is crucial to putting a price tag on site remediation and to assuring my financial backers that this project, like other projects I have successfully undertaken, is economically viable. To fund this environmental assessment, the Town pledged in good faith to use \$248,000 in HUD monies from a Economic Development Initiative — Special Projects Grant for which the Town successfully applied shortly after the massive 2005 fire on the site. Unfortunately, although the Town made several proposals to HUD in an attempt to use the grant award for site assessment, HUD regulations ultimately prohibited the Town from using the funds for this purpose.

The EPA needs to know that I remain extremely interested in partnering with the Town to redevelop this property and put it back on the tax rolls. I recently completed the redevelopment of 560 On Main, formerly part of the American Thread complex in Williamntic and can envision a similar future for the InterRoyal site. If the Town of Plainfield is awarded a FY 2013 Brownfields Assessment Grant for

InterRoyal we can start the process of making that happen and the EPA can recoup its substantial investment in this property – and by extension the Village of Plainfield.

Sincerely

Patrick Schooley

COMMITTEES

ARMED SERVICES

SUBCOMMETTES
READMEDS
SLABOWER AND PROJECTION FORCES

AGRICULTURE

SUBCOMMETTES GENERAL FARM COMMODITIES AND RIGH MANAGEMENT LIVERTICK DARFY, AND PRINCERY

ETHICS



Joe Courtney Congress of the United States

2nd District, Connecticut

WASHINGTON OFFICE

215 CANNON HOUSE OFFICE BUILDING WASHINGTON, DC 20515 P (202) 225-2076 F (202) 225-4977

DISTRICT OFFICES

55 Main Street, Sorti 250 Norwich, CT 06360 P (860) 886-0139 F (860) 886-2974

77 HAZARO AVENUE, UNIT J ENHELD, CT 06082 P (860) 741-6011 F (860) 741-6036

October 15, 2012

Ms. Diane Kelley Regional Brownfield Coordinator US EPA Region 1 5 Post Office Square, Suite 100 Boston, MA 02109-3912

Dear Ms. Kelley:

I write in strong support of the grant application from the Town of Plainfield to move forward in the redevelopment of the abandon InterRoyal property located in the heart of the town. The Town of Plainfield has identified this project as a top priority for several reasons. The environmental impact of the brownfield must be assessed to determine the severity of the contamination. As with many defunct mill sites in New England the Quinebaug River corridor is dotted with many abandon sites. The Town of Plainfield has listed this project in the Plan of Conservation and Development as a location worthy of redevelopment due to the proximity of the interstate highway and the railroad. The people of Plainfield take great pride in their textile manufacturing history, however, this site has been unused since 1995 and the company is no longer in business. Public investment is the only source available to move this parcel forward.

The focus of EPA to transform brownfields must start with the necessary assessments. This application highlights the poison, carcinogens, asbestos and lead on the property identified over fifteen years ago. The next step must be taken in order to move this site back into a prosperous asset to the community. Eastern Connecticut has many needs and this application will promote job creation short and long term, stabilize the contamination and promote a venue to protect the regional water supply.

I thank Administrator Jackson for her focus on underserved communities and striving to protect the water supply. I request fair and full consideration of this application and if I can be of any further assistance, please contact Sherri Vogt on my staff at 860-886-0139.

Sincerely yours,

Joe Courtney

Member of Congress

Le Courtrey



State of Connecticut House of Representatives

STATE CAPITOL HARTFORD, CONNECTICUT 06106-1591

REPRESENTATIVE MAE M. FLEXER FORTY-FOURTH ASSEMBLY DISTRICT

LEGISLATIVE OFFICE BUILDING ROOM 4111 HARTFORD, CT 06106-1591

HOME: 860-208-0429 CAPITOL: 860-240-8585 TOLL FREE: 800-842-8267 FAX: 860-240-0206 E-MAIL: Mae.Flexer@cga.ct.gov CHAIRMAN INTERNSHIP COMMITTEE

MEMBER

HUMAN SERVICES COMMITTEE
JUDICIARY COMMITTEE
PLANNING AND DEVELOPMENT COMMITTEE

November 9, 2012

Ms. Diane Kelley
Regional Brownfields Coordinator
US Environmental Protection Agency Region 1
U.S. EPA 5 Post Office Square – Suite 100
Boston, MA 02109-3912

Dear Ms. Kelley:

I write in strong support of the Town of Plainfield's FY 2013 EPA Brownfields Assessment Application for the former InterRoyal site. This 16+ acre property forms the linchpin of Plainfield Village, a blighted and economically distressed low-income neighborhood. Not only do the site's remaining buildings contain hazardous materials, they are structurally unsound due to a massive 2005 fire, which spread asbestos and lead debris over five square miles and forced the evacuation of numerous homes and the closing of a nearby school. In addition, the soil and groundwater of the site are contaminated with, among other things, volatile organic compounds, petroleum and metals. In the event of another major release of hazardous materials like the one in 2005, the Town's water supply could be compromised.

Without a completed assessment of this property, it will not be redeveloped and without an anchor business for the Village, this community's revitalization prospects are virtually nonexistent. In the last 18 months alone, some half a dozen small businesses have closed their doors for good; those that remain, surrounded by empty store fronts, struggle to get by. Even the Village library has closed because the Village, with its high unemployment and shrinking commercial tax base, simply does not possess the resources to continue to support it. This trend of closures is likely to continue as long as the InterRoyal site remains in its current, deteriorating condition. Prospective businesses understandably do not want to locate near a hazardous eyesore in a decaying neighborhood. Unfortunately it is the residents of this neighborhood who pay the ultimate price for this through high unemployment, reduced

job opportunities, a reduction in home values and a complete lack of the cultural amenities that many of us take for granted.

I strongly recommend that the Town of Plainfield be awarded a FY 2013 EPA Brownfields Assessment Grant so that the work of rebuilding Plainfield Village can begin.

Sincerely,

Mae Flexer

Appendix 3 Special Considerations Checklist

Please identify (with an \mathcal{X}) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. Describe how each consideration applies to your proposal and/or attach documentation.

U	Community population is 10,000 or less
	Federally recognized Indian tribe
	United States territory
	Applicant assisting a Tribe or territory
	Targeted brownfield sites are impacted by mine-scarred land
	Targeted brownfield sites are contaminated with controlled substances
M	Community is impacted by recent natural disaster(s) (2005 or later). To be considered, applicant must identify here the timeframe and type of natural disaster.
V	Project is primarily focusing on Phase II assessments
	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
	Community experiencing plant closures (or other significant economic disruptions) (2007 or later), including communities experiencing auto plant closures due to bankruptcy or economic disruptions. To be considered, applicant must identify here the timeframe and name of the plant recently closed and jobs lost, or reason for other significant economic disruption.
The contract	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, applicant must attach documentation which demonstrates this connection to a HUD-DOT-EPA PSC grant.
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant
	Community is implementing green remediation plans.

Appendix 3

Documentation in Support of Special Considerations Checklist

1. The Community is impacted by recent natural disaster(s) (2005 or later). Documentation on the timeframe and type of natural disaster is provided below. State and Federal governmental Declarations of Emergency for these disasters are attached.

October 28, 2012: Superstorm Sandy. State of Emergency Declaration. Widespread prolonged power outages and roadway closures.

October 29, 2011: October Snowstorm. State of Emergency Declaration. Heavy snow and tree damage causing prolonged widespread power outages and roadway closures.

August 25, 2011: Hurricane Irene. State of Emergency Declaration. Widespread heavy winds and flooding resulting in prolonged power outages and roadway closures.

March, 2010: March 13 and 31 Flood Events. State of Emergency Declaration. Widespread flooding and associated damage to property and roadways.

- 2. The project for which EPA Brownfields grant funding is being applied involves Phase III investigation of the InterRoyal Mill property. The purpose of this investigation is to fill data gaps in previous investigations and provide a comprehensive site characterization that can be used to develop remedial action plans and a cost estimate to abate asbestos, lead-based paint, and chemical hazards known to exist on the property.
- 3. The community is experiencing significant economic disruptions. Plainfield Village has become almost entirely dependent on small businesses, which comprise more than 70% of Town-wide employment and an even higher percentage of Village employment. In the last 24 months alone, at least ten small businesses and the library have closed in Plainfield Village; the remaining businesses, surrounded by empty store fronts, struggle to remain open. These closures have been exacerbated by the uncertain economic climate and by the multiple natural disasters that have impacted Windham County. This trend of closures can be expected to continue as long as the InterRoyal site remains in its deteriorating state. Businesses simply cannot thrive in close proximity to such a hazardous eyesore in a blighted neighborhood with high flood insurance.





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STATE OF CONNECTICUT GOVERNOR DANNEL P. MALLOY

October 28, 2012

GOV. MALLOY STATEMENT ON APPROVAL BY PRESIDENT OBAMA OF PRE-LANDFALL EMERGENCY DECLARATION IN CONNECTICUT

(HARTFORD, CT) - Governor Dannel P. Malloy released the following statement in response to President Obama's approval Sunday night of the Governor's request to declare a pre-landfall emergency in Connecticut, which will allow the state to request federal funding and other assistance in advance of Hurricane Sandy's impact on the state.

"I would like to thank President Obama for understanding the necessity of declaring an emergency in our state in advance of the storm," Governor Malloy said. "As each forecast has come in, it's become more and more clear that this storm will have a major impact on Connecticut. We cannot walt until after it hits to begin the process of seeking emergency assistance. State emergency management personnel under my direction have already been working with the FEMA team assigned to Connecticut to coordinate these efforts, understanding the urgency our residents are facing."

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For Immediate Release: October 28, 2012

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The Honorable Denise Merrill Secretary of the State State Capitol 210 Capitol Avenue Hartford, CT 06106

RE: Declaration of Civil Preparedness Emergency

Dear Secretary Merrill:

Due to the severe weather conditions predicted to affect the State, specifically the National Weather Service issuance of forecasts indicating that all or part of Connecticut will be directly affected by a combined tropical and winter super storm, including torrential rainfall, strong winds, and potential coastal and inland flooding over a prolonged period of time; I am hereby proclaiming a state of civi preparedness emergency, pursuant to Connecticut General Statutes Section 28-9.

I am filing this proclamation with you under my hand and seal on this 27th day of October, 2012.

Dannel P. Malloy

Governor

TIME: 10:45 Am





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October 29, 2011

GOV. MALLOY DECLARES STATE OF EMERGENCY

Heavy Snow, Tree Damage Causing Widespread Power Outages Throughout State

(HARTFORD, CT) - Governor Dannel P. Malloy declared a state of emergency at 5:30 this evening due to the severe winter storm that is impacting the entire state.

Heavy snowfall on top of leaf -covered trees is causing widespread damage and power outages throughout

"Residents should stay off the roads right now, let the road crews get out there and get things cleaned up," said Governor Mailoy. "Streets are dangerous, power lines are down and we are seeing extensive tree damage with more to come as high winds enter the state. We will begin the restoration and recovery phase as soon as possible, but right now I urge Connecticut residents to stay home and stay safe."

The declaration provides the Governor with additional emergency powers that he may utilize in response to the storm. Earlier today, the Governor also issued a ban of all non-emergency vehicles on the Wilbur Cross/Merritt Parkways. Bus service in Danbury and Waterbury has been suspended and MetroNorth railroad is operating with delays.

The Governor will brief the media tomorrow at 8:30 am at the State Armory in Hartford.

###

For Immediate Release: October 29, 2011 Contact: Colleen Flanagan

Colleen.Flanagan@ct.gov 860-524-7308 (office) 860-770-8090 (cell)

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October 7, 2011

GOV. MALLOY ANNOUNCES FEDERAL AID FOR FARMERS IN ALL 8 CONNECTICUT COUNTIES HIT BY TROPICAL STORM IRENE

(HARTFORD, CT) - Governor Malloy announced today that United States Department of Agriculture Secretary Thomas Visack has granted his September 15 request for a disaster designation in Connecticut due to agricultural losses caused by Tropical Storm Irene.

Secretary Vilsack designated Fairfield, Hartford, Litchfield, Middlesex, New Haven, New London, and Windham Counties as primary natural disaster areas due to "losses caused by strong winds, heavy rainfall, and severe flooding associated with Tropical Storm Irene." Tolland County was named a contiguous disaster county as a result of its adjacent location to primary disaster counties.

The disaster designation allows farmers in all eight Connecticut counties to apply for USDA Farm Service Agency (FSA) assistance including emergency loans and Supplemental Revenue Assistance Payments (SURE).

"Many of our farms were hit hard by Irene and then suffered from the subsequent flooding," said Gov. Malloy. "I am pleased that Secretary Vilsack has granted this key disaster designation to all eight Connecticut counties to help our farmers who are feeling the economic impact of crop loss and production interruptions. These funds will help mitigate some of the damage sustained by those in Connecticut's critical agricultural sector.

"We are very appreciative that Secretary Vilsack has responded to the Governor's request on behalf of our state's farmers," said Connecticut Department of Agriculture Commissioner Stephen Reviczky. "Connecticut has a vibrant and active agriculture sector, and the family farm is still a major part of our landscape today. It is critical that that the state and federal governments work together to support the recovery efforts for our farms and farm operators.

Farms may apply for emergency loans immediately and must have their applications in within eight months of the designation to be considered. FSA will evaluate each loan application on its own merits, considering the extent of the farm's production losses, the security available, and its repayment ability. Applications for the SURE program will be accepted in 2012 after the 2011 farm revenue data required by statute is available.

Connecticut farmers interested in applying for assistance can contact FSA at one of these state or local offices:

FSA State Office 344 Merrow Road, Suite B Tolland, CT 06084-3917 860-871-2944

FSA Brooklyn Office 139 Wolf Den Road 860-774-8397

FSA Norwich Office 238 West Town Street 860-887-9941

FSA Torrington Office 1185 New Litchfield Street 860-626-8852

FSA Vernon Office 24 Hyde Avenue 860-875-9770

FSA Wallingford Office 900 Northrup Road, Suite A 203-269-6665

FSA Windsor Office





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GOVERNOR DANNEL P. MALLOY

August 25, 2011

GOV. MALLOY SIGNS DECLARATION OF EMERGENCY

(HARTFORD, CT) - In advance of Hurricane Irene's likely impact on Connecticut, Governor Dannel P. Malloy today signed a Declaration of Emergency this afternoon. The Declaration of Emergency provides Governor Malloy with a number of emergency powers, including:

- The ability to order evacuations of all or part of the population of a stricken or threatened area and take necessary steps for receipt and care of evacuees
- The ability to modify or suspend any state statute, regulation, or requirement (for example: altering work hours, waiving licensing requirements, etc.)
- · The ability to order civil preparedness forces into action
- The ability to designate vehicle and person routes and movements

"The forecast path of Hurricane Irene has convinced me that the signing of this declaration is necessary, and will help us react more quickly and effectively in the event of a serious weather event," said Governor Malloy. "I will continue to work with state and local officials and authorities to ensure that our state is as prepared as possible for Hurricane Irene, and can react as efficiently as possible on behalf of our residents."

**Attached: Governor Malloy's Declaration of Civil Preparedness Emergency

For Immediate Release: August 25, 2011 Contact: Colleen Flanagan Colleen.Flanagan@ct.gov 860-524-7308 (office) 860-770-8090 (cell)

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For Immediate Release

April 23, 2010

President Obama Signs Connecticut Disaster Declaration

The President today declared a major disaster exists in the State of Connecticut and ordered Federal aid to supplement State and local recovery efforts in the area struck by severe storms and flooding beginning on March 12 2010 and continuing

Federal funding is available to State and eligible local governments and certain private nonprofit organizations on a cost-sharing bas s for emergency work and the repair or replacement of facilities damaged by the severe storms and flooding in the counties of Fairfield, Middlesex, and New London

Federal funding is also available on a cost sharing basis for hazard mitigation measures statewide

W. Craig Fugate: Administrator, Federal Emergency Management Agency (FEMA): Department of Homeland Security, named Michael L. Parker as the Federal Coordinating Officer for Federal recovery operations in the affected area

FEMA said additional designations may be made at a later date if requested by the State and warranted by the results of further damage assessments

FOR FURTHER INFORMATION CONTACT: FE MA (202) 646-3272

EXTENDING MIDDLE-CLASS TAX CUTS

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BLOG POSTS ON THIS ISSUE

November 18 2012 1 15 PM EST

President Obama's First Stop in Asia Is in Thailand



The first nation on the itinerary for President Obama's Asia Irip Is Thailand -- America's didest friend on the

continent with diplomatic tes stretching back nearly 180 years.

November 17 2012 545 AM EST

Weekly Address: Working Together to Extend the Middle Class Tax Cuts President Obama urges Congress to act now on one thing that everyone agrees on - ensuring that taxes don't go up on 98 percent of all Americans and 97 percent of small businesses at the end of the year

November 15, 2012 8 99 PM EST

Weekly Wrap Up: "That's Who We Are" Here's a quick glimpse at what happened this week on WhiteHouse gov

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Connecticut – Severe Storms and Flooding FEMA-1904-DR

Declared April 23, 2010

On April 9, 2010, and in her amended letter dated April 12, 2010, Governor M. Jodi Rell requested a major disaster declaration due to severe storms and flooding during the period of March 12 to May 17, 2010. The Governor requested a declaration for Individual Assistance for five counties; Public Assistance, including direct Federal assistance for 3 counties; and Hazard Mitigation for all counties. During the period of March 29 to April 9, 2010, joint Federal, State, and local Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below. PDAs estimate damages immediately after an event and are considered, along with several other factors, in determining whether a disaster is of such severity and magnitude that effective response is beyond the capabilities of the State and the affected local governments, and that Federal assistance is necessary.

On April 23, 2010, President Obama declared that a major disaster exists in the State of Connecticut. This declaration made Public Assistance requested by the Governor available to State and eligible local governments and certain private nonprofit organizations on a cost-sharing basis for emergency work and the repair or replacement of facilities damaged by the severe storms and flooding in Fairfield, Middlesex, and New London Counties. Direct Federal assistance also was authorized. Finally, this declaration made Hazard Mitigation Grant Program assistance requested by the Governor available for hazard mitigation measures statewide.²

Summary of Damage Assessment Information Used in Determining Whether to Declare a Major Disaster

Individual Assistance

Total Number of Residences Impacted:³ 1,315

Destroyed - 5 Major Damage - 154 Minor Damage - 487 Affected - 669

Percentage of insured residences:⁴ (29%)
 Percentage of low income households:⁵ (5%)

Percentage of elderly households:⁶

Total Individual Assistance cost estimate: \$5,262,100

Public Assistance

Primary Impact: Damage to roads and bridges

• Total Public Assistance cost estimate: \$11,568,438

Statewide per capita impact: 7 \$3.40

Statewide per capita impact indicator: 8

• Countywide per capita impact:

\$1.29

Fairfield County (\$4.54) Middlesex County (\$3.68)

New London County (\$26.99)

Countywide per capita impact indicator:⁹

\$3.23

¹ The preliminary damage assessment (PDA) process is a mechanism used to determine the impact and magnitude of damage and resulting needs of individuals, businesses, public sector, and community as a whole. Information collected is used by the State as a basis for the Governor's request for a major disaster or emergency declaration, and by the President in determining a response to the Governor's request (44 CFR § 206.33).

² When a Governor's request for major disaster assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act) is under review, a number of primary factors are considered to determine whether assistance is warranted. These factors are outlined in FEMA's regulations (44 CFR § 206.48). The President has ultimate discretion and decision making authority to declare major disasters and emergencies under the Stafford Act (42 U.S.C. § 5170 and § 5191).

Degree of damage to impacted residences:

Destroyed – total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls or roof);

Major Damage – substantial failure to structural elements of residence (e.g., walls, floors, foundation), or damage that will take more than 30 days to repair;

Minor Damage – home is damaged and uninhabitable, but may be made habitable in short period of time with repairs; and

Affected – some damage to the structure and contents, but still habitable.

⁴ By law, Federal disaster assistance cannot duplicate insurance coverage (44 CFR § 206.48(b)(5)).

⁵ Special populations, such as low-income, the elderly, or the unemployed may indicate a greater need for assistance (44 CFR § 206.48(b)(3)).

⁶ lbid (44 CFR § 206.48(b)(3)).

Based on State population in the 2000 Census.

⁸ Statewide Per Capita Impact Indicator for FY10, Federal Register, October 1, 2009.

⁹ Countywide Per Capita Impact Indicator for FY10, Federal Register, October 1, 2009.